

**National Highway Traffic Safety Administration**  
**Information Collection Request Supporting Statements: Part A**  
**49 CFR Part 561 “Documentation for Electric-Powered Vehicles”**  
**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.**

The National Traffic and Motor Vehicle Safety Act authorizes the Secretary of Transportation (NHTSA by delegation), at 49 U.S.C. 30111, to issue Federal Motor Vehicle Safety Standards (FMVSS) that set performance standards for motor vehicles and items of motor vehicle equipment. Further, pursuant to 49 U.S.C. 30166, NHTSA is authorized to reasonably require manufacturers to keep records or make records to determine whether the manufacturer has complied with this Safety Act or a regulation prescribed under the Safety Act. Pursuant to this delegated authority, in the agency’s final rule published on December 20, 2024, agency finalized regulation under 49 CFR Part 561 for two type of information collections: 1) two emergency response information (emergency response guides(ERG) and rescue sheets (RS)) and 2) four rechargeable electrical energy storage system (REESS) documentation requirements rather than in the proposed FMVSS No. 305a,<sup>1</sup> given that the documentation specifications are more akin to a disclosure requirement than a performance test.

For the first two information collections, EV manufacturers are required to submit specified safety information for each vehicle model/year in the form of ERGs and RSs. An emergency response guide contains in-depth vehicle-specific information related to fire, submersion, leakage of fluids, towing and storage of vehicles for emergency responders. A rescue sheet is an

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<sup>1</sup> In the NPRM (89 FR 26704; published April 15, 2024), the agency proposed a restructured and updated FMVSS No. 305a, “Electric-powered Vehicles: Electric Powertrain Integrity” and, as proposed three new information collection: 1) Electric Vehicles: Emergency Response Guides (ERGs); 2) Electric Vehicles: Rescue Sheets (RSs); and 3) Rechargeable Electrical Energy Storage System ( REESS) Thermal Propagation Safety Risk Analysis and Mitigation Documentation.

abbreviated version of the emergency response guide that gives quick information about a vehicle's construction, intended for use by emergency responders at the scene of a crash. The requirements for ERGs and RSs address an identified need for vehicle-specific rescue information. A safety report published by the National Transportation Safety Board (NTSB) in 2020<sup>2</sup> detailed the investigation of four electric vehicle fires. The investigation identified safety risks to emergency responders from exposure to high voltage components and from vehicle fire due to damaged cells in the REESS that could reignite as a result of stranded energy. The NTSB investigation also identified the lack of a clear and standardized format in the manufacturer's ERGs and inadequacy in the information provided in the ERGs for emergency responders to minimize safety risks posed by stranded energy in the REESS while handling electric vehicles. To address the need for standardized emergency response information, NHTSA is requiring that EV manufacturers provide ERGs and RSs in a standardized format.

, NHTSA also finalized a requirement that EVs compile and maintain REESS thermal propagation safety risk analysis and mitigation documentation. Specifically, to the December 20, 2024 final rule<sup>3</sup> requires EV manufacturers to maintain safety risk mitigation documentation that would allow the agency to verify that EV manufacturers have identified, implemented, and documented risk mitigation for certain hazards. There are currently no objective test procedures to evaluate mitigation of these safety risks in a manner that is battery technology neutral, and not design restrictive, making documentation the best option. This requirement is intended to ensure that EV manufacturers address known safety risks as well as mitigate the consequences from the occurrence of unknown safety risks associated with EVs.

**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.**

For the first two collections, NHTSA requires EV manufacturers to submit ERGs and RSs to NHTSA. The ERGs and RSs must communicate vehicle-specific information related to fire, submersion, and towing, as well as the location of components in the vehicle that may expose the vehicle occupants or rescue personnel to risks, the nature of a specific function or danger, and devices or measures which inhibit a dangerous state. NHTSA requires that the ERGs and RS

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<sup>2</sup> "Safety risks to emergency responders from lithium-ion battery fires in electric vehicles," Safety Report NTSB/SR-20/01, PB2020-101011, National Transportation Safety Board, <https://www.nts.gov/safety/safety-studies/Documents/SR2001.pdf>.

<sup>3</sup> 89 FR 104318

meet the layout and format specified in ISO-17840, “Road vehicles – Information for First and Second responders,”<sup>4</sup> which standardize color-coded sections in a specific order to help responders quickly identify pertinent vehicle-specific rescue information. NHTSA is requiring this information so that NHTSA can make it readily available to emergency responders so that they can refer to vehicle specific rescue information enroute to or at the scene of a crash or fire event. Having standardized documents with clear safety information readily available will enable emergency responders to act quickly and safely. The rescue information from this collection will be used by emergency responders for their own safety and to enhance emergency response. The reason that NHTSA is requiring the submission of both ERGs and RSs is because NHTSA has determined that there is value in making available to the public both a document containing in-depth vehicle-specific information related to fire submersion, leakage of fluids, towing, and storage of vehicles (ERGs) as well as a an abbreviated version of the ERG that provides quick information about a vehicle’s construction that can be used by emergency responders at the scene of a crash or fire.

The third information collection is a requirement for manufacturers of EVs, subject to Part 561, to compile and maintain risk mitigation documentation. The documentation requirements include safety risk mitigation associated with charging and discharging during cold temperature, safety risk mitigation associated with an internal short-circuit in a single cell of a REESS, an audio-visual warning to the vehicle occupant for a thermal event in the REESS, and a visual warning to the vehicle occupant in the event of a malfunction of the vehicle controls that manage REESS safe operation. In lieu of objective tests, the documentation helps ensure that EV manufacturers address known safety risks as well as mitigate the consequences of certain safety risks associated with EVs. The manufacturers will be required to maintain the information for 5 years and to provide it to NHTSA upon request. Because NHTSA anticipates only requesting such documentation in the course of an investigation, this ICR only covers the compilation and retention of the documentation.

**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,**

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<sup>4</sup> <https://www.iso.org/standard/78461.html>, <https://www.iso.org/standard/67351.html>, and <https://www.iso.org/standard/67353.html>,

**and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.**

The collection of information of emergency response information is fully electronic, as the information will be submitted through a website. The information will be made available to the public through the NHTSA website and will be searchable by vehicle make, model, and model year.

The record retention requirement for risk mitigation documentation does not require that manufacturers store the documentation in any particular manner. Therefore, manufacturers are free to choose the option most appropriate and cost effective for them. Since most manufacturers use computer-based systems to generate and store information about their vehicles, NHTSA assumes that most, if not all, manufacturers will store the information in this manner.

**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 has not identified any similar information already available that can be used for the purposes described above. Currently, emergency response information for alternative fuel vehicles voluntarily submitted by manufacturers are available on the NFPA website.<sup>5</sup> However, emergency response information is not available for all EVs and there is no standardized format for the information provided. The information is also vehicle-specific and cannot be replaced by a general guide. This collection will ensure that safety information for all EVs is available in a centralized location and in a standardized format for ease of use by emergency responders.

Additionally, in regard to the information collection for compilation and record retention of risk mitigation documentation, NHTSA is the only Federal agency regulating EV safety standards. The United States Hazardous Materials Regulations (HMR), 49 CFR parts 171 to 180, include requirements for lithium batteries in accordance with UN 38.3, “Transport of dangerous goods: Manual of tests and criteria.” However, this standard is intended for safe transport of the batteries and does not include NHTSA’s documentation requirement of safety risk mitigation

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<sup>5</sup> See <https://www.nfpa.org/Training-and-Events/By-topic/Alternative-Fuel-Vehicle-Safety-Training/Emergency-Response-Guides>.

associated with charging and discharging during cold temperature, safety risk mitigation associated with an internal short-circuit in a single cell of a REESS, and warning in the event of a malfunction of the vehicle controls that manage REESS safe operation.

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

The collections of information will apply to all manufacturers of EVs subject to Part 561. Although most EVs will be produced by large manufacturers, NHTSA expects the information collections to apply to and, therefore, impact small entities as well. However, NHTSA does not believe the information collections will be burdensome to the small entities as they largely involve information that the manufacturer already possesses and the burden for submitting or retaining the information is expected to be small. The agency has minimized the burden on manufacturers by allowing or using an electronic collection. No other effective easy means have been found to minimize the burden. For the emergency response information submission, there is no additional compliance time given to small manufacturers, however, for the documentation requirements, small manufacturers were given an additional one year compliance time.

**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.**

If the emergency response information is not collected, emergency responders will not have a comprehensive database of standardized emergency response information for EVs. The required standardization of EV emergency response information can be available at a central location is likely to help reduce the risk to the emergency response personnel, vehicle occupants, and others in the vicinity during an emergency. It is important for the collection to be ongoing to maintain an accurate safety database for all EVs that responders can reference. Since the information is only required to be submitted once for each make, model, model year configuration, the frequency of collection cannot be reduced.

The risk mitigation record retention requirement is important to ensure that thermal runaway propagation safety hazards that do not have corresponding testing requirements are addressed

and the requirements can be enforced for the safety of the motoring public. If the risk mitigation information is not collected, the agency will be less likely to verify that the manufacturers have developed and implemented safety risk mitigation strategies in EVs sold in the United States. The frequency of this collection is also once, and therefore cannot be reduced.

**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.**

NHTSA is requesting exemptions to the requirement at 5 CFR 1320.5(d)(2)(i) to allow NHTSA to collect emergency response information frequency in certain circumstances on an as needed basis and documentation requirements to be retained for 5 years.

Generally, the regulation will only require emergency response information submission prior to first sale or lease for new models after the effective date. If there are any necessary updates or correction to the already submitted emergency response information, the manufacturers will submit the emergency response information, and on an as needed basis. This will ensure emergency response information is accurate and current for the safety of the emergency responders.

The second exemption requested is for documentation requirements to be retained for five years. This would align with NHTSA's average record keeping requirements for regulations, such as potential malfunction-related documentation. For example, prior to the final rule published on August 16, 2024 (89 FR 66629), NHTSA's record retention period, under 49 CFR 576, for motor vehicles, child restraint systems, and tires concerning malfunctions that may be related to motor vehicle safety under the Safety Act was 5 years.

**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.**

NHTSA sought public comments on this ICR in the Notice of Proposed Rulemaking for FMVSS No. 305a that was published on April 15, 2024 (89 FR 26704).

The NPRM did not receive any burden or cost calculation comments. However, in the final rule (89 FR 104318; published on December 20, 2024), the emergency response information and four documentation requirements were added to the general regulation Part 561 rather than in the proposed FMVSS No. 305a, given that the documentation specifications are more akin to a disclosure requirement than a performance test. The estimated total burden of this collection is modified to account for the final rule's addition of the audio-visual warning for a thermal event

in the REESS to be part of the documentation requirements that was not initially proposed in the NPRM.

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

No payment or gift will be provided to any respondent.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.**

No assurance of confidentiality will be provided to respondents. The only information that would be submitted to NHTSA or otherwise disclosed under this ICR are the ERGs and RSs. Since those documents are intended to be made publicly available and easily accessible to emergency responders, any assurance of confidentiality would be contrary to the purpose of the requirement.

Submission for the documentation requirements will be requested upon the agency's request. Requested documentation may be submitted as Confidential Business Information (CBI) under 49 CFR Part 512. NHTSA will follow 49 CFR part 512 confidential submissions procedures.

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

The information collection does not include any personal information or 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.**

The estimated total annual burden to respondents for the Part 561 information collection requirements is estimated to be 19,565 hours and the annual estimated cost for labor associated with the burden hours is estimated to be \$1,128,079.71. NHTSA provides the breakdown for the three information collections below.

*1. Information Collection 1: Compilation and Submission of Emergency Response Guide to NHTSA*

NHTSA estimates that 205 ERGs, or responses, will be submitted annually. This estimate is based on the estimated number of EV models produced each year. Electric vehicle models encompass battery-powered electric vehicles, plug-in hybrid electric vehicle, hybrid electric vehicle, and fuel cell electric vehicle models. The agency estimates that 205 different EV models are sold annually that would be subject to Part 561.

In order to estimate the burden associated with these estimated 205 submissions, NHTSA first estimated the number of new ERGs that would need to be created, the number of ERGs that would be required to be updated, and the number of ERGs that would require no updates. Each year, some vehicle models are newly introduced while others are carried over from the previous year(s). NHTSA anticipates that the same ERG would be used for multiple model years.

Additionally, because this ICR is for a new requirement, NHTSA estimates that the number ERGs that will need to be updated will be higher in the first year than it will be in subsequent years. In each year, NHTSA estimates that new ERGs will need to be compiled for roughly 25% of the estimated 205 EV models, or approximately 51 models. In the first year, NHTSA estimates that roughly 50% or approximately 103 models will have ERGs that will need to be updated to comply with the requirements. However, in following years, NHTSA estimates that only 25% of models, or approximately 51 models will have ERGs that need updating. Therefore, for this ICR, NHTSA estimates an average of 68 ERGs will need to be updated each year.

Additionally, NHTSA estimates that out of the 205 EV models, 51 models or approximately 25%

of EV models will already have rescue sheets and ERGs that conform to the requirements. In subsequent years, NHTSA estimates that this will rise to approximately 50% of all models, or about 103 models per year that will not require updating. Therefore, NHTSA estimates that, on average, 86 models will not require updating each year.

NHTSA estimates the time for creating ERGs to be approximately 27 hours. This burden includes the time to compile the required information, which the manufacturer is expected to already have, format it according to ISO-17840-2:2019<sup>6</sup> and review the document. NHTSA estimates the time to update existing ERGs to take approximately 5 hours. For all ERGs, NHTSA estimates the burden for submission to be 15 minutes. The burden table below breaks down how NHTSA estimated the total burden for ERGs to be approximately 1,767 hours a year, or approximately 8.62 hours per submission.

**Table 1: Annual Burden Hours Associated with ERGs**

| <b>New, Modified, or Carry-Over?</b> | <b>Average Number of Models per Year</b> | <b>Time to Prepare Information</b>          | <b>Time to Submit Information</b>          | <b>Total Burden per Submission</b> | <b>Total Burden</b>          |
|--------------------------------------|--|---|--|------------------------------------|------------------------------|
| Models Requiring New ERGs            | 51                                       | 27 hours                                    | .25 hours                                  | 27.25 hours                        | 1,389.75 hours               |
| Models Requiring Updated ERGs        | 68                                       | 5 hours                                     | .25 hours                                  | 5.25 hours                         | 357 hours                    |
| Models Requiring No Update           | 86                                       | 0 hours                                     | .25 hours                                  | .25 hours                          | 20.25 hours                  |
|                                      | <b>205</b>                               | <b>8.37 hours on average per submission</b> | <b>.25 hours on average per submission</b> | <b>8.62 hours</b>                  | <b>1,767<br/>1,767 hours</b> |

## *2. Information Collection 2: Compilation and Submission of Rescue Sheets to NHTSA*

<sup>6</sup> <https://www.iso.org/standard/67351.html>

NHTSA estimates that 205 rescue sheets (RSs), or responses, will be submitted annually. This estimate is based on the estimated number of EV models produced each year. Electric vehicle models encompass battery-powered electric vehicles, plug-in hybrid electric vehicle, hybrid electric vehicle, and fuel cell electric vehicle models. The agency estimates that 205 different EV models are sold annually that would be subject to Part 561.

In order to estimate the burden associated with these estimated 205 submissions, NHTSA first estimated the number of new RSs that would need to be created, the number of RSs that would be required to be updated, and the number of RSs that would require no updates. Each year, some vehicle models are newly introduced while others are carried over from the previous year(s). NHTSA anticipates that the same RSs would be used for multiple model years. Additionally, because this ICR is for a new requirement, NHTSA estimates that the number RSs that will need to be updated will be higher in the first year than it will be in subsequent years. In each year, NHTSA estimates that new RSs will need to be compiled for roughly 25% of the estimated 205 EV models, or approximately 51 models. In the first year, NHTSA estimates that roughly 50% or approximately 103 models will have RSs that will need to be updated to comply with the requirements. However, in following years, NHTSA estimates that only 25% of models, or approximately 51 models will have RSs that need updating. Therefore, for this ICR, NHTSA estimates an average of 68 RSs will need to be updated each year. Additionally, NHTSA estimates that out of the 205 EV models, 51 models or approximately 25% of EV models will already have rescue sheets and RSs that conform to the requirements. In subsequent years, NHTSA estimates that this will rise to approximately 50% of all models, or about 103 models per year that will not require updating. Therefore, NHTSA estimates that, on average, 86 models will not require updating each year.

NHTSA estimates the time for creating RSs to be approximately 9 hours. This burden includes the time to compile the required information, which the manufacturer is expected to already have, format it according to ISO-17840-1:2022 and review the document. NHTSA estimates the time to update existing ERGs to take approximately 1 hour. For all RSs, NHTSA estimates the burden for submission to be 15 minutes. The burden table below breaks down how NHTSA

estimated the total burden for RSs to be approximately 551 hours a year, or approximately 2.69 hours per submission.

**Table 2: Annual Burden Hours Associated with RSs**

| <b>New, Modified, or Carry-Over?</b> | <b>Average Number of Models per Year</b> | <b>Time to Prepare Information</b>          | <b>Time to Submit Information</b>          | <b>Total Burden per Submission</b>          | <b>Total Burden</b>         |
|--------------------------------------|--|---|--|---|-----------------------------|
| Models Requiring New RSs             | 51                                       | 9 hours                                     | .25 hours                                  | 9.25 hours                                  | 471.75 hours                |
| Models Requiring Updated RSs         | 68                                       | 1 hours                                     | .25 hours                                  | 1.25 hours                                  | 85 hours                    |
| Models Requiring No Update           | 86                                       | 0 hours                                     | .25 hours                                  | .25 hours                                   | 21.5 hours                  |
|                                      | <b>205</b>                               | <b>2.44 hours on average per submission</b> | <b>.25 hours on average per submission</b> | <b>2.69 hours on average per submission</b> | <b>578.25<br/>578 hours</b> |

*3. Information Collection 3: Compilation and Retention of Risk Mitigation Documentation*

NHTSA estimates that there will be, on average, 205 responses to the requirement that EV manufacturers compile and retain risk mitigation documentation. NHTSA estimates that there will be 205 responses based on the estimates that will be 205 unique EV models produced each year. For each of these models, manufacturers will compile and maintain documentation that identifies all known safety risks, describes their risk mitigation strategies, and describes how they provide a warning to address a safety hazard for three areas. For each vehicle model, NHTSA estimates that manufacturers will need an estimated 84 hours to compile the required documentation. This time consists of an estimated 17 hours to compile the documentation for low temperature operation safety, 17 hours for the documentation for thermal event warning, 17 hours for the documentation about warning in the event of operational failure of REESS vehicle controls, and 33 hours for the documentation covering thermal runaway due to internal short in a

single cell of the REESS. The total burden hours for EV manufacturers to put together these documentation packets is estimated to be 17,220 hours (205 models × 84 hours/model). The previous total estimated burden hours for the three documentation requirements in the NPRM was 13,735 hours (205 vehicle models × 67 hours).

Together, NHTSA estimates that the total annual burden hours associated with the three information collections to be 19,565 hours (1,767 hours + 578 hours + 17,220 hours). To estimate the labor costs associated with these burden hours, NHTSA looked at the type of employee that would be involved with each aspect of the information collection and the hourly labor rates published by the Bureau of Labor Statistics (BLS).

NHTSA expects that the work compiling and updating ERGs and RSs as well as compiling the risk mitigation documentation would be done by a technical writer (occupational code 27-3042), for which BLS estimates the mean hourly wage to be \$40.64<sup>7</sup>. BLS estimates that hourly wages represent approximately 70.3% of total compensation for private industry workers.<sup>8</sup> Therefore, NHTSA estimates the labor cost associated with technical writers to be \$57.81 per hour.

NHTSA expects submission of the ERGs and RSs would be done by an administrative professional (occupational code 43-0000), for which BLS estimates the mean hourly wage to be \$31.17<sup>9</sup>. BLS estimates that hourly wages represent approximately 70.3% of total compensation for private industry workers.<sup>10</sup> Therefore, NHTSA estimates the labor cost associated with less senior Technical Writers to be \$44.33 per hour.

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<sup>7</sup> See May 2023 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](https://www.bls.gov/oes/2023/may/naics4_336100.htm). This has been updated since the NPRM. In the NPRM, we used the May 2022 wage estimate of \$44.71 and in turn total compensation of \$66.63 (using the September 2023 Employer Cost of 70.6%).

<sup>8</sup> Employer Costs for Employee Compensation – March 2024. See Table 1. Employer Costs for Employee Compensation by ownership. [https://www.bls.gov/news.release/archives/ecec\\_06182024.pdf](https://www.bls.gov/news.release/archives/ecec_06182024.pdf). (Accessed July 16, 2024). This has been updated since the NPRM. In the NPRM, we used the September 2023 estimate of 70.6%.

<sup>9</sup> See May 2023 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](https://www.bls.gov/oes/2023/may/naics4_336100.htm). This has been updated since the NPRM. In the NPRM, we used the May 2022 wage estimate of \$29.36 and in turn total compensation of \$41.59.

<sup>10</sup> Employer Costs for Employee Compensation – March 2024. See Table 1. Employer Costs for Employee Compensation by ownership. [https://www.bls.gov/news.release/archives/ecec\\_06182024.pdf](https://www.bls.gov/news.release/archives/ecec_06182024.pdf). (Accessed July 16, 2024).

NHTSA’s estimates for labor costs are shown in the table below:

**Table 3: Estimated Annual Labor Hours**

| <b>Information Collection</b>                         | <b>Average Number of Responses</b> | <b>Technical Writer Hours Per Response</b> | <b>Technical Writer Hourly Labor Cost</b> | <b>Administrative Personnel Hours Per Response</b> | <b>Administrative Personnel Hourly Labor Cost</b> | <b>Total Annual Labor Cost</b>           |
|---|------------------------------------|--|---|--|---|--|
| Compiling and Submitting ERGs                         | 205                                | 8.37 hours                                 | \$57.81                                   | .25 hours  | \$44.33   | \$101,448.04<br>(\$494.87 per response)  |
| Compiling and Submitting RSs                          | 205                                | 2.44 hours                                 | \$57.81                                   | .25 hours  | \$44.33   | \$31,183.47<br>(\$152.12 per response)   |
| Compiling and Retaining Risk Mitigation Documentation | 205                                | 84 hours                                   | \$57.81                                   | N/A  | N/A   | \$995,488.2<br>(\$4,856.04 per response) |
|   |                                    |  |   |  |   | <b>\$1,128,079.71</b>                    |

As shown above, NHTSA estimates the total labor costs associated with labor hours to be approximately \$1,128,079.71 per year.

A breakdown of the total burden hours for the three information collections is provided in the table below.

**Table 4: Annual Burden Hours for this ICR**

| <b>Information Collection</b> | <b>Average Number of Responses Each Year</b> | <b>Average Number of Respondents Each Year</b> | <b>Average Burden Hours Per Submission</b> | <b>Total Burden Hours</b> |
|-------------------------------|--|--|--|---------------------------|
| Compiling and Submitting ERGs | 205  | 24   | 8.62 hours                                 | <b>1,767 hours</b>        |
| Compiling and Submitting RSs  | 205  | 24   | 2.69 hours                                 | <b>578 hours</b>          |
| Compiling and Retaining Risk  | 205  | 24   | 84 hours                                   | <b>17,220</b>             |

|                          |  |  |  |                     |
|--------------------------|--|--|--|---------------------|
| Mitigation Documentation |  |  |  |                     |
| <b>Total:</b>            |  |  |  | <b>19,565 hours</b> |

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

NHTSA estimates that there will be no costs to respondents other than the labor costs accounted for in question 12 above. Therefore, total annual burden cost is estimated to be \$0.

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

The estimated annual cost to the Federal government consists of (1) maintaining the website for the emergency response guide submissions, and (2) reviewing the information submitted for both the emergency response information.

(1) Cost of EV Emergency Response Information Website Maintenance

An IT professional is expected to set up a dedicated NHTSA webpage for manufacturer submission and for the submitted emergency response information to be publicly available. Using the hourly wage of a web developer is \$64.06 for a GS13, Step 1, in Washington, DC. To estimate total compensation costs, NHTSA used the Bureau of Labor Statistics estimate that wages and salary only represent 61.6% of total employee compensation cost for State and local employees,<sup>11</sup> which brings the total hourly cost for this employee’s time to approximately \$104.87. The estimated time to create NHTSA’s dedicated webpage on NHTSA’s current website for manufacturer submission is 80 hours. The estimated initial labor cost for building the dedicated webpage to NHTSA’s existing website is \$ 8,389.61 (\$104.87/hour x 80 hours). Then the estimated time to

<sup>11</sup> See Table 1. Employer Costs for Employee Compensation by ownership (MONTH YEAR), available at <https://www.bls.gov/bls/news-release/eccec.htm>, last accessed [DATE].

maintain the information collection and public access website is 80 hours annually. The estimated annual labor cost is \$8,389.61 (\$104.87/hour x 80 hours).

## (2) Cost of Review

Review of the information to ensure it has been properly submitted will be completed by NHTSA staff members along with their other duties. The hourly wage is \$66.79 for a GS-14, Step 1, in Washington, DC.<sup>12</sup> To estimate total compensation costs, NHTSA used the Bureau of Labor Statistics estimate that wages and salary only represent 61.6% of total employee compensation cost for State and local employees,<sup>13</sup> which brings the total hourly cost for this employee's time to approximately \$108.42. The estimated time for reviewing the information to ensure the emergency response guides have been submitted correctly and completely is 80 hours annually. The associated cost is \$8,673.6 (\$108.42/hour x 80 hours). The estimated time to review the risk mitigation documentation is 120 hours annually, with an associated cost of \$13,010.4 (\$108.42/hour x 120 hours).

The initial estimated cost to the Federal government for building the emergency response information submission and depository NHTSA website is \$8,389.61. The total estimated annual cost to the Federal government for the emergency response information and risk mitigation documentation collection is \$30,073.61 (\$8,389.61 + \$8,673.6 + \$13,010.4).

**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 a new collection and the change in burden is an increase in burden of 19,565 hours and \$0 to account for the entire burden of the new type of collections.

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<sup>12</sup> [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/DCB\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/DCB_h.pdf).

<sup>13</sup> See Table 1. Employer Costs for Employee Compensation by ownership (September 10, 2024), available at <https://www.bls.gov/bls/news-release/eccec.htm>, last accessed November 26, 2024.

**15. 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 will publish the emergency response information submitted by EV manufacturers. Both the ERGs and RSs will be made available on NHTSA's websites to be easily accessible to emergency responders. Since the second information collection is a record-retention requirement, there are no plans to publish that information.

**16. 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.

**17. 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>14</sup>**

There are no exceptions to the certification statement.

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<sup>14</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.