

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

**SUPPORTING STATEMENT
“Licensing Applications for Motor Carrier Operating Authority”
ICR, OMB Control No. 2126-0016**

SUMMARY

- This ICR is a renewal. This ICR renewal has a program adjustment increase of 78,103 responses and 156,180 burden hours as shown in section 12. The increase is due to an increase in the number of entities that registered from 2020-2022 and were required to obtain operating authority registration. The average number of entities which registered in the three-year period 2020 through 2022 increased by 96 percent compared to the number that registered 2017 through 2019.
- This ICR applies to the following respondents:
 - Existing FMCSA registrants¹ who are subject to FMCSA’s licensing, registration, and certification regulations that wish to apply for additional operating authorities; and
 - Mexico-domiciled carriers that wish to operate beyond the U.S. municipalities on the U.S.-Mexico border and their commercial zones.
- Existing registrants seeking additional operating authorities must continue to use the applicable form: OP-1, OP-1(P), OP-1(FF), and/or (NNA). Mexico-domiciled carriers seeking initial registration authority or additional authorities must use Form OP-1(MX). FMCSA is requesting that information collection approval for the OP-1 form series, including Form OP-1(MX), continue to be effective for the 3-year period covered by this ICR. However, as described further, below, non-Mexico-domiciled first-time applicants seeking an initial FMCSA-issued registration must apply using a different method and form.

INTRODUCTION

The Federal Motor Carrier Safety Administration (FMCSA) is submitting to the Office of Management and Budget (OMB) its request to renew a currently approved information collection (ICR) titled *Licensing Applications for Motor Carrier Operating Authority*, covered by OMB Control Number 2126-0016 which is due to expire on May 31, 2024.

¹ Existing registrants are entities that already have a USDOT number and/or operating authority.

Part A. Justification

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

FMCSA has the following legislative authorities to require the following motor carrier entities to register with the Agency:

- For-hire motor carriers of regulated commodities and of passengers, under 49 U.S.C. § 13902(a) (Attachment A);
- Surface freight forwarders, under 49 U.S.C. § 13903 (Attachment B);
- Property brokers, under 49 U.S.C. § 13904 (Attachment C); and
- Certain Mexico-domiciled motor carriers, under 49 U.S.C. § 13902(c) (Attachment A).

These types of motor carriers may conduct transportation services in the United States only if they are registered with FMCSA. Each registration is effective from the date specified and remains in effect for such period as the Secretary of Transportation (Secretary) determines by regulations.

Currently, FMCSA is in the process of developing an online, consolidated registration system. This development began with the “Unified Registration System (URS),” which is a system designed to streamline FMCSA’s registration process. This is a result of the Final Rule titled “Unified Registration System,” (78 FR 52608) dated August 23, 2013, which implemented statutory provisions for an online registration system for entities that are subject to FMCSA’s licensing, registration, and certification regulations (Attachment D). The purpose of the URS is to streamline the registration process into one dynamic online application (Form MCSA-1, “Unified Registration System, FMCSA Registration/Updates”) and serve as a clearinghouse and repository of information for entities required to register with FMCSA.

Previous to the development of the URS, in order to register with FMCSA or apply for additional authorities, applicants submitted relevant OP-1 form(s) depending on the type of motor carrier entity seeking operating authority. The OP-1 forms were made available to print out from FMCSA’s website and respondents would either print and mail the forms or print and upload documents via FMCSA’s website. Under URS, the goal is for the OP-1 forms to fold into one overarching application: the MCSA-1. Information is collected through URS, and the MCSA-1 is a dynamic application within URS that is meant to be used by all motor carriers seeking authority or seeking to add to their existing authority, with the exception of form OP-1(MX).

In the implementation of the URS, FMCSA began a phased rollout in 2015. The first phase became effective on December 12, 2015. The first phase impacted only first-time applicants seeking an FMCSA-issued registration.

FMCSA had planned subsequent URS rollout phases for existing registrants wishing to add additional authorities, however, there were substantial delays, and subsequent phases have not been rolled out to date. As a result, on January 17, 2017, FMCSA issued a Final Rule titled “Unified Registration System; Suspension of Effectiveness,” which indefinitely

suspended URS effectiveness dates for existing registrants (82 FR 5292) (Attachment E).

Pursuant to the delay in the URS system subsequent phases and resulting rule, FMCSA continues to accept only forms OP-1, OP-1(P), OP-1(FF), and OP-1(NNA) for existing registrants wishing to apply for additional authorities.

As described above, only non-Mexico-domiciled first-time applicants seeking an initial FMCSA-issued registration must apply via URS. Under URS, all forms described in the current ICR, except OP-1(MX), are folded into the Form MCSA-1. Information collection activities associated with the Form MCSA-1 are covered under a different ICR, titled “FMCSA Registration/Updates,” OMB Control No. 2126-0051.

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

The OP form series consist of the following:

- OP-1 “Application for Motor Property Carrier and Broker Authority;”
- OP-1(P) “Application for Motor Passenger Carrier Authority;”
- OP-1(FF) “Application for Freight Forwarder Authority” (property or household goods);
- OP-1(MX) “Application to Register Mexican Carriers for Motor Carrier Authority to Operate Beyond U.S. Municipalities and Commercial Zones on the U.S.- Mexico Border;” and
- OP-1 (NNA) “Application for U.S. Department of Transportation (USDOT) Registration by Non-North America-Domiciled Motor Carriers.”

Information collected through these forms aids FMCSA in determining the type of operation a company will run, the cargo it will carry, and the resulting level of insurance coverage the applicant will be required to obtain and maintain to continue its operating authority. The OP-1 series of forms request information on the applicant’s familiarity with relevant safety requirements, the applicant’s willingness to comply with those requirements during its operations, and the applicant’s willingness to meet any specific statutory and regulatory requirements applicable to its proposed operations.

FMCSA also uses information from these forms to prepare a public notice of the registration application for each applicant, which is then published electronically in the “FMCSA Register” at <https://li-public.fmcsa.dot.gov/>. Publication of this notice initiates a 10-day period during which an interested party may file a complaint seeking denial of the registration on a limited number of statutory grounds.

If no complaints are filed, FMCSA will issue the registration authorizing surface transportation operations (i.e., operating authority) if: (1) the applicant is willing and able to comply with all applicable statutory and regulatory provisions and safety fitness requirements, and (2) the applicant has made the required insurance and process agent filings under statute (49 USC 13902 and 49 CFR Part 365.107). For Form OP-1(MX) applications, such FMCSA publication will occur only after the motor carrier successfully completes the Pre-authorization Safety Audit (PASA) and FMCSA approves the application. Such

publication of an application summary as a preliminary grant of authority in the FMCSA Register is not an issuance of registration authority but notice to the public to permit interested parties wishing to oppose the authority to submit a protest to FMCSA under 49 CFR 365.507(d). A preliminary grant of authority cannot become effective as an active operating authority for a minimum of 10 days after publication.

3. EXTENT OF AUTOMATED INFORMATION COLLECTION

As noted above, effective December 12, 2015, OP-1 series forms, with the exception of OP-1(MX), can only be used to apply for additional authorities, not for initial registration with FMCSA. These forms request information to identify the applicant, the nature and scope of its proposed operations, a narrative description of the applicant's safety policies and procedures, and information regarding the drivers and vehicles it plans to use in U.S. operations.

Forms OP-1, OP-1(P), OP-1(FF), and OP-1(NNA) can be filed online or in paper format. For the purposes of this ICR, FMCSA assumes that all existing registrants using forms OP-1, OP-1(P), OP-1(FF), or OP-1(NNA) will file online. Currently, Form OP-1(MX) can only be filed using the paper format.

4. EFFORTS TO IDENTIFY DUPLICATION

There are no similar filings made with any other Federal agency or within the Department of Transportation that would result in duplication of this information.

5. EFFORTS TO MINIMIZE THE BURDEN ON SMALL BUSINESSES

The paperwork burdens associated with completing OP-1 series forms are minimal for small businesses, as the forms are easy to understand and complete. However, non-U.S. domiciled applicants are required to provide basic information and additional safety information and certifications of compliance to demonstrate their willingness and ability to comply with applicable safety regulations. The requested information cannot be obtained from any other source, since all Mexico-domiciled applicants will be located outside of the United States, and this ICR requests no more information than is necessary to ensure compliance with applicable safety regulations.

6. IMPACT OF LESS FREQUENT COLLECTION OF INFORMATION

OP-1, OP-1(P), OP-1(FF), and OP-1(NNA): There is no requirement that any of these forms be filed on a periodic basis. The forms are filed on an "as needed" basis. Since the rollout of URS Phase I, the sole purpose of these forms is to allow existing registrants to apply for additional authorities.

OP-1(MX): A new application form is currently required only if a Mexico-domiciled carrier wishes to extend the scope of its authority or is applying for new authority. Under the current registration rules at 49 CFR part 365.509, subpart E, when a Mexico-domiciled carrier wishes to expand its authority, it must make an "initial filing" of the Form OP-1(MX) and go through the full application process to obtain the additional authority. All Mexico-domiciled

carriers are required to report changes in basic identifying information, such as addresses and telephone numbers, through supplemental filings within 45 days or as changes occur. FMCSA does not require Mexico-domiciled registrants to re-file the entire form in these circumstances.

7. SPECIAL CIRCUMSTANCES

There are no special circumstances with this information collection.

8. COMPLIANCE WITH 5 CFR 1320.8:

On December 14, 2023, FMCSA published a notice in the Federal Register (88 FR 86722) with a 60-day public comment period to announce its intention to submit this ICR to OMB for renewal (see Attachment F). FMCSA received no comments in response to the published notice.

9. PAYMENTS OR GIFTS TO RESPONDENTS

Respondents are not provided with any payment or gift for this information collection.

10. ASSURANCE OF CONFIDENTIALITY

These records are not confidential. The OP-1 series of forms call for information identifying the applicant and the scope of its proposed operations. All registration applications filed with FMCSA become part of a public docket and are open to the public for inspection and review.

11. JUSTIFICATION FOR COLLECTION OF SENSITIVE INFORMATION

There are no questions of a sensitive nature.

12. ESTIMATE OF BURDEN HOURS FOR INFORMATION REQUESTED

ASSUMPTIONS FOR BURDEN ESTIMATES

The estimates provided in Table through 6 are based on the number of OP-1 forms collected by FMCSA during the calendar years (CY) 2020, 2021, and 2022.¹ Only partial data are available for 2023; therefore, that year is not being used. FMCSA attributed the increase in the number of forms collected in 2022 as a result of the overall number of registrations with FMCSA increased in the year following the COVID-19 pandemic. The number of forms collected decreased in 2022 and has returned to the levels that existed prior to the COVID-19 pandemic. FMCSA used the average number of total forms received across all three years (Table 1) to produce the 2024, 2025, and 2026 annual estimates. Please note, some figures provided in the tables below may be affected by rounding.

¹ FMCSA, Licensing & Insurance (L&I) data for calendar years 2020, 2021 and 2022.

Table 1 Number of OP-1 Forms Collected during Calendar Years 2020, 2021 and 2022

CY	OP1	OP1(P)	OP1(FF)	OP1 (MX)	OP1(NNA)
2020	111,126	796	6,084	18	1
2021	190,065	1,090	6,339	19	1
2022	156,878	1,257	4,251	9	0
Totals	458,069	3,143	16,674	46	2
<i>Average</i>	<i>152,690</i>	<i>1,048</i>	<i>5,558</i>	<i>15</i>	<i>1</i>

The average annual burden is calculated by multiplying the number of respondents by the estimated form completion time. FMCSA estimates Forms OP-1, OP-1(P), and OP-1(FF) take 2 hours to complete. Forms OP-1(MX) and OP-1(NNA) are estimated to take 4 hours to complete.

Table 2 Estimated Annualized Burden Hours for FORM OP-1, “Application for Motor Property Carrier and Broker Authority.”

Year	Number of Respondent Form OP-1 (a)	Number of Responses (a × 1 = b)	Average Burden Hours per Response (c)	Total Burden Hours (b × c = d)
2024	152,690	152,690	2	305,380
2025	152,690	152,690	2	305,380
2026	152,690	152,690	2	305,380
Total	458,070	458,070		916,140
<i>Annual Average (rounded)</i>	<i>152,690</i>	<i>152,690</i>		<i>305,380</i>

Table 3 Estimated Annualized Burden Hours for FORM OP-1(P), “Application for Motor Passenger Carrier Authority.”

Year	Number of Respondent Form OP-1(P) (a)	Number of Responses (a × 1 = b)	Average Burden Hours per Response (c)	Total Burden Hours (b × c = d)
2024	1,048	1,048	2	2,096
2025	1,048	1,048	2	2,096
2026	1,048	1,048	2	2,096
Total	3,144	3,144		6,288
<i>Annual Average (rounded)</i>	<i>1,048</i>	<i>1,048</i>		<i>2,096</i>

Table 4 Estimated Annualized Burden Hours for FORM OP-1(FF), “Application for Registration by Freight Forwarder.”

Year	Number of Respondent Form OP-1(FF) (a)	Number of Responses (a × 1 = b)	Average Burden Hours per Response (c)	Total Burden Hours (b × c = d)
2024	5,558	5,558	2	11,116
2025	5,558	5,558	2	11,116
2026	5,558	5,558	2	11,116
Total	16,674	16,674		33,348
<i>Annual Average (rounded)</i>	<i>5,558</i>	<i>5,558</i>		<i>11,116</i>

Table 5 Estimated Annualized Burden Hours for FORM OP-1(MX) “Application to Register Mexican Carriers for Motor Carrier Authority to Operate Beyond U.S. Municipalities and Commercial Zones on the U.S. – Mexico Border.”

Year	Number of Respondent Form OP-1(MX) (a)	Number of Responses (a × 1 = b)	Average Burden Hours per Response (c)	Total Burden Hours (b × c = d)
2024	15	15	4	60
2025	15	15	4	60
2026	15	15	4	60
Total	45	45		180
<i>Annual Average (rounded)</i>	<i>15</i>	<i>15</i>		<i>60</i>

Table 6 Estimated Annualized Burden Hours for, FORM OP-1(NNA), “Application for U.S. Department of Transportation (USDOT) Registration by Non-North America-Domiciled Motor Carriers.”

Year	Number of Respondent IC-5 Form OP-1(NNA) (a)	Number of Responses (a × 1 = b)	Average Burden Hours per Response (c)	Total Burden Hours (b × c = d)
2024	1	1	4	4
2025	1	1	4	4
2026	1	1	4	4
Total	3	3		12
<i>Annual Average (rounded)</i>	<i>1</i>	<i>1</i>		<i>4</i>

Table 7 below provides the total anticipated annual burden summary, based on all OP forms.

Table 7. Annual Burden Summary

Form	Number of Respondents	Number of Responses	Annual Burden Hours
OP-1	152,690	152,690	305,380
OP-1(P)	1,048	1,048	2,096
OP-1(FF)	5,558	5,558	11,116
OP-1(MX)	15	15	60
OP-1(NNA)	1	1	4
Total	159,312	159,312	318,656

In conclusion, the total estimated annual burden to respondents is **318,656** hours and total number of annual respondents is **159,312**.

For this renewal, FMCSA continues to assume the entity’s *Compliance Officer* will be the person responsible for submitting forms OP-1, OP-1(P), OP-1(FF), OP-1(NNA) and OP-1(MX). While compliance officers who fill out forms OP-1(NNA) and/or OP-1(MX) may be compliance officers domiciled in another country, for simplicity, FMCSA continues to assume the same wage estimate for all forms. In 2022, the U.S. Department of Labor reported Compliance Officers who work in the U.S. Transportation industry receive a median hourly wage of \$22.53.²

In addition to the wage and/or salary costs, motor carrier entities must also pay for certain benefits such as health insurance, vacation, and sick leave, which make up the compliance officer’s total compensation. As is best practice for labor cost estimation methodology, FMCSA continues to use the total cost of compensation or the “loaded” salary and wage rate for all labor categories included in this information collection. To develop the loaded wage rate for a Compliance Officer, FMCSA uses the Department of Labor’s *Employer Costs for Employee Compensation for Private Industry Workers by Occupational and Industry Group* data table, released March 2023. FMCSA divides the total hourly cost of compensation for the *Transportation and Moving Material* series, \$35.34, by just the *Wages and Salaries* of the same series, \$24.01. This gives us an applicable load factor of 1.50 ($\$35.34/\$24.01=1.50$). Multiplying the load factor by the Compliance Officer’s median wage and salary rate of \$22.53 per hour equals \$33.16 ($\$22.53 \times 1.50 = \33.16), which is the total fully loaded hourly cost of compensation for a Compliance Officer.

Table 8 through 12 below provide summaries of the annualized burden cost by form.

Table 8. Estimated Annualized Burden Labor Cost for FORM OP-1, “Application for Motor Property Carrier and Broker Authority.”

² Bureau of Labor Statistics (2022). “Occupational Employment and Wages,” May 2022, NAICS 43-5011– Cargo and Freight Agents.” Available at <https://www.bls.gov/oes/current/oes435011.htm> (accessed August 6, 2023).

Year	Number of Respondents Form OP-1 (a)	Number of Responses (a × 1 = b)	Average Burden Hours per Response (c)	Total Burden Hours (b × c = d)	Loaded Hourly Wage (e)	Total Labor Costs (d × e)
2024	152,690	152,690	2	305,380	\$33.16	\$10,126,401
2025	152,690	152,690	2	305,380	\$33.16	\$10,126,401
2026	152,690	152,690	2	305,380	\$33.16	\$10,126,401
Total	458,070	458,070		916,140		\$30,379,202
<i>Annual (rounded)</i>	<i>152,690</i>	<i>152,690</i>		<i>305,380</i>		<i>\$10,126,401</i>

Table 9. Estimated Annualized Burden Labor Cost for FORM OP-1(P), “Application for Motor Passenger Carrier Authority.”

Year	Number of Respondents Form OP-1(P) (a)	Number of Responses (a × 1 = b)	Average Burden Hours per Response (c)	Total Burden Hours (b × c = d)	Loaded Hourly Wage (e)	Total Labor Costs (d × e)
2024	1,048	1,048	2	2,096	\$33.16	\$69,503
2025	1,048	1,048	2	2,096	\$33.16	\$69,503
2023	1,048	1,048	2	2,096	\$33.16	\$69,503
Total	3,144	3,144		6,288		\$208,510
<i>Annual (rounded)</i>	<i>1,048</i>	<i>1,048</i>		<i>2,065</i>		<i>\$69,503</i>

Table 10. Estimated Annualized Burden Labor Cost for FORM OP-1(FF), “Application for Registration by Freight Forwarder.”

Year	Number of Respondent Form OP-1(FF) (a)	Number of Responses (a × 1 = b)	Average Burden Hours per Response (c)	Total Burden Hours (b × c = d)	Loaded Hourly Wage (e)	Total Labor Costs (d × e)
2024	5,558	5,558	2	11,116	\$33.16	\$368,607
2025	5,558	5,558	2	11,116	\$33.16	\$368,607
2026	5,558	5,558	2	11,116	\$33.16	\$368,607
Total	16,674	16,674		33,348		\$1,105,820
<i>Annual Average (rounded)</i>	<i>5,558</i>	<i>5,558</i>		<i>11,116</i>		<i>\$368,607</i>

Table 11. Estimated Annualized Burden Labor Cost for FORM OP-1(MX) “Application to Register Mexican Carriers for Motor Carrier Authority to Operate Beyond U.S. Municipalities and Commercial Zones on the U.S. – Mexico Border”

Year	Number of Respondent Form OP-1(MX) (a)	Number of Responses (a × 1 = b)	Average Burden Hours per Response (c)	Total Burden Hours (b × c = d)	Loaded Hourly Wage (e)	Total Labor Costs (d × e)
2024	15	15	4	60	\$33.16	\$1,990
2025	15	15	4	60	\$33.16	\$1,990
802026	15	15	4	60	\$33.16	\$1,990
Total	46	46		180		\$5,969
<i>Annual Average (rounded)</i>	<i>15</i>	<i>15</i>		<i>60</i>		<i>\$1,990</i>

Table 12. Estimated Annualized Burden Labor Cost for FORM OP-1(NNA), “Application for Registration by Non-North America-Domiciled Motor Carriers”

Year	Number of Respondent Form OP-1(NNA) (a)	Number of Responses (a × 1 = b)	Average Burden Hours per Response (c)	Total Burden Hours (b × c = d)	Loaded Hourly Wage (e)	Total Labor Costs (d × e)
2024	1	1	4	4	\$33.16	\$133
2025	1	1	4	4	\$33.16	\$133
2026	1	1	4	4	\$33.16	\$133
Total	3	3		12		\$399
<i>Annual average (rounded)</i>	<i>1</i>	<i>1</i>		<i>4</i>		<i>\$133</i>

Table 13 below provides the total annual burden labor cost summary, based on anticipated responses from all OP forms.

Table 13. Annual Hour and Cost Burden Summary

Form	Number of Respondents	Number of Responses	Annual Burden Hours	Annual Cost Burden
OP-1	152,690	152,690	305,380	\$10,126,401
OP-1(P)	1,048	1,048	2,096	\$69,503
OP-1(FF)	5,558	5,558	11,116	\$368,607
OP-1(MX)	15	15	60	\$1,990
OP-1(NNA)	1	1	4	\$133
Total	159,312	159,312	318,656	\$10,566,633

13. ESTIMATE OF TOTAL ANNUAL COSTS TO RESPONDENTS

In addition to labor costs, applicants are required to pay a \$300 filing fee for all forms in the OP-1 series, except for Form OP-1(NNA) if the applicant is a private carrier. To remain

consistent with the previous information collection, FMCSA assumes all OP-1(NNA) form submissions are from private carriers and thus does not include a \$300 fee for form OP-1(NNA). All forms are available to submit electronically, except Form OP-1(MX). FMCSA assumes that all of the forms available for electronic submission will be submitted electronically. As a result, for Form OP-1(MX) only, an associated international postage cost is included in these non-labor costs. FMCSA conservatively estimates a flat cost of \$12.50 for a filer to submit the form via mail. This includes the cost of a large envelope plus the cost of international postage for 4.8 ounces of mail.³ 4 through 18 provide summaries of the annualized burden non-labor cost by form.

Table 14. Estimated Non-Labor Annualized Burden Cost for FORM OP-1, “Application for Motor Property Carrier and Broker Authority.”

Year	Number of Respondent Form OP-1 (a)	Number of Responses (a × 1 = b)	Filing Fee (c)	Total Non-Labor Costs (b × c = d)
2024	152,690	152,690	\$300	\$45,807,000
2025	152,690	152,690	\$300	\$45,807,000
2026	152,690	152,690	\$300	\$45,807,000
Total	458,070	458,070		\$137,421,000
<i>Annual Average (rounded)</i>	<i>152,690</i>	<i>152,690</i>		<i>\$45,807,000</i>

Table 15. Estimated Non-Labor Annualized Burden Cost for FORM OP-1(P), “Application for Motor Passenger Carrier Authority.”

Year	Number of Respondent Form OP-1(P) (a)	Number of Responses (a × 1 = b)	Filing Fee (c)	Total Non- Labor Costs (b × c = d)
2024	1,048	1,048	\$300	\$314,400
2025	1,048	1,048	\$300	\$314,400
2026	1,048	1,048	\$300	\$314,400
Total	3,144	3,144		\$943,200
<i>Annual Average (rounded)</i>	<i>1,048</i>	<i>1,048</i>		<i>\$314,400</i>

Table 16. Estimated Non-Labor Annualized Burden Cost for FORM OP-1(FF), “Application for Registration by Freight Forwarder.”

³ See United States Postal Service Retail Calculator Postage Calculator. Estimate based on letter envelope at 4.8 ounces. For this calculation, FORM OP1-MX is approximately 30 pages. 10 pages weighs approximately 1.6 ounces. Retail calculated available here: <https://postcalc.usps.com/Calculator/ShapeAndSize?country=10287&ccode=MX&omil=False&dmil=False&mdt=7%2F29%2F2020&mdz=19%3A29&m=0&dvi=0&ct7=True> (accessed June 29, 2020).

Year	Number of Respondent Form OP-1 (FF) (a)	Number of Responses (a × 1 = b)	Filing Fee (c)	Total Non-Labor Costs (b × c = d)
2024	5,558	5,558	\$300	\$1,667,400
2025	5,558	5,558	\$300	\$1,667,400
2026	5,558	5,558	\$300	\$1,667,400
Total	16,674	16,674		\$5,002,200
<i>Annual Average (rounded)</i>	<i>5,558</i>	<i>5,558</i>		<i>\$1,667,400</i>

Table 17. Estimated Non-Labor Annualized Burden Cost for FORM OP-1(MX), “Application to Register Mexican Carriers for Motor Carrier Authority to Operate Beyond U.S. Municipalities and Commercial Zones on the U.S. – Mexico Border.

Year	Number of Respondent Form OP-1(MX) (a)	Number of Responses (a × 1 = b)	Filing Fee (c)	Total Filing Fee (b × c = d)	Mailing Fee (b × \$12.5=e)	Total Non-Labor Costs (d + e = f)
2024	15	15	\$300	\$4,500	\$188	\$4,688
2025	15	15	\$300	\$4,500	\$188	\$4,688
2026	15	15	\$300	\$4,500	\$188	\$4,688
Total	45	45		\$13,500	\$563	\$14,063
<i>Annual Average (rounded)</i>	<i>15</i>	<i>15</i>		<i>\$4,500</i>	<i>\$188</i>	<i>\$4,688</i>

Table 18. Estimated Non-Labor Annualized Burden Cost for (NNA), “Application for Registration by Non-North America-Domiciled Motor Carriers.”

Year	Number of Respondent Form OP-1(NNA) (a)	Number of Responses (a × 1 = b)	Filing Fee (c)	Total Non-Labor Costs (b × c = d)
2024	1	1	\$0	\$0
2025	1	1	\$0	\$0
2026	1	1	\$0	\$0
Total	3	3		\$0
<i>Annual Average (rounded)</i>	<i>1</i>	<i>1</i>		<i>\$0</i>

Table 19 below provides the total annual burden non-labor cost summary.

Table 19. Total Non-Labor Costs

Form	Total Non-Labor Costs
OP-1	\$45,807,000
OP-1(P)	\$314,400
OP-1(FF)	\$1,667,400
OP-1(MX)	\$4,587.50
OP-1(NNA)	\$0
Total	\$47,793,488

In conclusion, the total estimated annual non-labor cost is \$47,793,488.

14. ESTIMATE OF COST TO THE FEDERAL GOVERNMENT

The “OP” forms, except for OP-1(MX), are processed by 15 *Customer Service Agents* (equivalent of a Grade 9) at the FMCSA Contact Center in London, KY. The OP-1(MX) form is processed by 2 *Transportation Specialists* (Grade 9, Step 10) at the Trans-Border Office. The estimated loaded hourly cost for processing forms OP-1, OP-1(P), OP-1(FF), and OP-1(NNA) is estimated to be \$47.44 per hour, comprising wages of \$37.06 per hour⁴ and benefits equal to 28 percent of wages, or a load factor of 1.28.⁵ Using the same methodology, the average labor cost for OP-1(MX) is estimated to be \$49.40⁶ (\$38.59 per hour x 1.28 load factor). Processing an OP-1, OP-1(P), or OP-1(FF) form is estimated to take 6.5 hours each. Processing an OP-1(MX) or OP-1(NNA) form is estimated to take 8.5 hours. Table 20. through 24 provide summaries of the annualized burden cost by form to the federal government.

Table 20. Estimated Annualized Burden Cost to Federal Government for FORM OP-1, “Application for Motor Property Carrier and Broker Authority.”

Year	Number of Respondents	Number of	Average Burden	Total Burden	Loaded Hourly	Total Labor Costs
------	-----------------------	-----------	----------------	--------------	---------------	-------------------

⁴ Office of Personnel Management. Salary Table 2023-CIN for the Locality Pay for the area of Cincinnati-Wilmington-Maysville, OH-KY-IN, Available https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/CIN_h.pdf (Accessed November 29, 2023).

⁵ Load factor for federal workers is consistent with other FMCSA ICRs.

⁶ Office of Personnel Management. Salary Table 2023 DFW for the Locality Pay for the area of Dallas-Fort Worth, TX. Available at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/DFW_h.pdf (accessed November 1, 2023).

	Form OP-1 (a)	Responses (a × 1 = b)	Hours per Response (c)	Hours (b × c = d)	Wage (e)	(d × e = f)
2024	152,690	152,690	6.5	992,485	\$47.44	\$47,080,488
2025	152,690	152,690	6.5	992,485	\$47.44	\$47,080,488
2026	152,690	152,690	6.5	992,485	\$47.44	\$47,080,488
Total	458,069	458,069	19.5	2,977,455		\$141,250,465
<i>Annual Average (rounded)</i>	<i>152,690</i>	<i>152,690</i>	<i>6.5</i>	<i>992,485</i>		<i>\$47,080,488</i>

Table 21. Estimated Annualized Burden Cost to Federal Government for FORM OP-1(P), “Application for Motor Passenger Carrier Authority.”

Year	Number of Respondents Form OP-1(P) (a)	Number of Responses (a × 1 = b)	Average Burden Hours per Response (c)	Total Burden Hours (b × c = d)	Loaded Hourly Wage (e)	Total Labor Costs (d × e = f)
2024	1,048	1,048	6.5	6,812	\$47.44	\$323,161
2025	1,048	1,048	6.5	6,812	\$47.44	\$323,161
2026	1,048	1,048	6.5	6,812	\$47.44	\$323,161
Total	3,144	3,144	19.5	20,436		\$969,484
<i>Annual Average (rounded)</i>	<i>1,048</i>	<i>1,048</i>	<i>6.5</i>	<i>6,812</i>		<i>\$323,161</i>

Table 22. Estimated Annualized Burden Cost to Federal Government for FORM OP-1(FF), “Application for Registration by Freight Forwarder.”

Year	Number of Respondents OP-1(FF) (a)	Number of Responses (a × 1 = b)	Average Burden Hours per Response (c)	Total Burden Hours (b × c = d)	Loaded Hourly Wage (e)	Total Labor Costs (d × e = f)
2024	5,558	5,558	6.5	36,127	\$47.44	\$1,713,865
2025	5,558	5,558	6.5	36,127	\$47.44	\$1,713,865
2026	5,558	5,558	6.5	36,127	\$47.44	\$1,713,865
Total	16,674	16,674	19.5	108,381		\$5,141,595
<i>Annual Average (rounded)</i>	<i>5,558</i>	<i>5,558</i>	<i>6.5</i>	<i>36,127</i>		<i>\$1,713,865</i>

Table 23. Estimated Annualized Burden Cost to Federal Government for FORM OP-1(MX) “Application to Register Mexican Carriers for Motor Carrier Authority to Operate Beyond U.S. Municipalities and Commercial Zones on the U.S. – Mexico Border.”

Year	Number of Respondents Form OP-1(MX) (a)	Number of Responses (a × 1 = b)	Average Burden Hours per Response (c)	Total Burden Hours (b × c = d)	Loaded Hourly Wage (e)	Total Labor Costs (d × e = f)
2024	15	15	8.5	128	\$49.40	\$6,323
2025	15	15	8.5	128	\$49.40	\$6,323
2026	15	15	8.5	128	\$49.40	\$6,323
Total	45	45	25.5	384		\$18,969
<i>Annual Average (rounded)</i>	<i>15</i>	<i>15</i>	<i>8.5</i>	<i>128</i>		<i>\$6,323</i>

Table 24. Estimated Annualized Burden Cost to Federal Government for FORM OP-1(NNA), “Application for U.S. Department of Transportation (USDOT) Registration by Non-North America-Domiciled Motor Carriers.”

Year	Number of Respondents Form OP-1(NNA) (a)	Number of Responses (a × 1 = b)	Average Burden Hours per Response (c)	Total Burden Hours (b × c = d)	Loaded Hourly Wage (e)	Total Labor Costs (d × e)
2024	1	1	8.5	8.5	\$47.44	\$403
2025	1	1	8.5	8.5	\$47.44	\$403
2026	1	1	8.5	8.5	\$47.44	\$403
Total	3	3	25.5	25.5		\$1,209
<i>Annual Average (rounded)</i>	<i>1</i>	<i>1</i>	<i>8.5</i>	<i>8.5</i>		<i>\$403</i>

Table 25 below provides the total annual burden cost summary for anticipated costs to the Federal Government.

Table 25. Total Costs to the Federal Government

Form	Total Non-Labor Costs
OP-1	\$47,083,488

OP-1(P)	\$323,161
OP-1(FF)	\$1,713,865
OP-1(MX)	\$6,323
OP-1(NNA)	\$403
Total	\$49,127,241

In summary, the estimated annualized labor cost to the federal government: \$49,127,241.

15. EXPLANATION OF PROGRAM CHANGES OR ADJUSTMENTS

The current iteration of this ICR estimated the average annual burden to be **162,476** annual burden hours, with **81,209** total annual respondents. For this renewal, the estimated average annual burden is an increase to **318,656** with total average annual **159,312** respondents. The annual burden hourly increase of **156,180** is due to the increase in average annual respondents that registered from 2020-2022 and were required to obtain operating authority registration. The average number of entities which registered in the three-year period 2020 and 2022 increased by 96 percent compared to the number that registered 2017 through 2019. FMCSA used the average number of total forms received across all three years to produce the 2024, 2025, and 2026 annual estimates. Table 26 details the changes in burden estimates.

Table 26. Change in burden from approved collection

Information Collection Version	Annual Number of Respondents	Annual Number of Responses	Annual Burden Hours
Currently Approved under OMB Control Number 2126-0016	81,209	81,209	162,476
Revised Estimates	159,312	159,312	318,656
Total Change in Burden from the Currently Approved Collection of Information	78,103	78,103	156,180

16. PUBLICATION OF RESULTS OF DATA COLLECTION

FMCSA uses a portion of the collected data to prepare a public notice of the registration application, which is published in the “FMCSA Register.” Publication of this notice initiates a 10-day period during which an interested party may file a complaint seeking denial of the registration on a limited number of statutory grounds.

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

FMCSA does not request such approval.

18. EXCEPTIONS TO CERTIFICATION STATEMENT

None

ATTACHMENTS:

- A. 49 U.S.C. § 13902(a)
- B. 49 U.S.C. § 13903
- C. 49 U.S.C. § 13904
- D. Final Rule titled “Unified Registration System,” 78 FR 52608 (August 23, 2013)
- E. Final Rule titled “Unified Registration System; Suspension of Effectiveness,” 82 FR 5292 (January 17, 2017)
- F. 60-day Federal Register notice (88 FR 86722), published on December 14, 2023