

**Department of Transportation
National Highway Traffic Safety Administration
Information Collection Request Supporting Statements: Part A
Uniform Tire Quality Grading Standards - 49 CFR Part 575.104
OMB Control No. 2127--0519**

Abstract:¹

This information collection supports the Uniform Tire Quality Grading Standards (UTQGS) under 49 CFR 575.104. UTQGS requires manufacturers of passenger car tires to test and grade tires for treadwear, traction, and temperature resistance, and to disclose this information to consumers at the point of sale to assist in comparing tire performance characteristics.

Manufacturers must submit UTQGS test results and grade determinations to the National Highway Traffic Safety Administration (NHTSA), affix paper tread labels to tires, and provide consumer information materials describing UTQGS grades. Manufacturers must also maintain records supporting assigned grades for the duration of tire production. This collection covers five requirements:

1. Conducting UTQGS testing and determining grades for treadwear, traction, and temperature resistance;
2. Submitting UTQGS test data, grade determinations, and tire identification information to NHTSA;
3. Affixing UTQGS paper labels to passenger car tires;
4. Preparing and distributing UTQGS consumer information materials at the point of sale; and
5. Maintaining UTQGS-related records for inspection by NHTSA;

This information collection supports NHTSA's consumer information mission under the National Traffic and Motor Vehicle Safety Act by ensuring the availability of uniform, accurate, and comparable tire performance information. UTQGS improves transparency in the tire marketplace and assists consumers in making informed safety-related purchasing decisions.

This is a request for reinstatement with modification of a previously approved information collection. The modification consists in clarify that approximately 45 manufacturers serve as respondents submitting materials on behalf of approximately 160 brand names, and to include the burden associated with compiling and submitting required materials to NHTSA under 49 CFR 575.6(d)(2). These modifications reflected decrease in the burden hours.

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

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 statute or regulation mandating or authorizing the collection of information.**

This information collection supports the requirements of 49 U.S.C. § 30123(b), which directs the Secretary of Transportation to establish a uniform quality grading system for motor vehicle tires to assist consumers in making informed purchasing decisions. The statute further directs the Secretary to cooperate with industry and the Federal Trade Commission to minimize deceptive or confusing tire nomenclature.

NHTSA implemented this statutory mandate through 49 CFR 575.104, Uniform Tire Quality Grading Standards (UTQGS). UTQGS establishes a national consumer information program requiring passenger car tire manufacturers and brand name owners to test tires for treadwear, traction, and temperature resistance, assign grades using standardized test procedures, and disclose those grades to consumers through labeling and point-of-sale materials. The regulation also requires manufacturers to submit UTQGS test and grading information to NHTSA and to maintain records supporting grade determinations. This information enables the agency to ensure that UTQGS grades are accurate, uniform, and comparable across tire brands and models.

- 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.**

Manufacturers and brand name owners conduct UTQGS testing and submit information to NHTSA to enable consumers to compare tire performance characteristics when purchasing replacement tires. NHTSA uses the submitted information to monitor compliance with UTQGS requirements, verify that grades are determined in accordance with standardized test procedures, and take enforcement action when necessary. Retailers rely on manufacturer-provided materials to satisfy point-of-sale disclosure requirements. Manufacturers also maintain records to support assigned grades and facilitate compliance reviews.

- 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.**

Manufacturers may use electronic, automated, or mechanical means to submit UTQGS information and supporting documentation to NHTSA. NHTSA encourages electronic submission of test data, compliance documentation, and reports to reduce administrative burden. Most UTQGS submissions are currently provided electronically. Retailers may also use electronic systems to display UTQGS information, provided the display meets the requirements of 49 CFR 575.104.

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

The information required under UTQGS is not collected by any other Federal program and cannot be obtained from other sources. Without this collection, NHTSA would be unable to carry out its statutory responsibilities under 49 U.S.C. § 30123(b).

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

Most entities subject to UTQGS are large tire manufacturers or brand name owners. Retailers, including small businesses, are only required to display manufacturer-provided point-of-sale materials and are not required to conduct testing or generate new information. Accordingly, the burden on small businesses is minimal.

- 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 UTQGS labeling and consumer information were not provided, consumers would lack uniform and comparable tire performance information, undermining the statutory purpose of the program and reducing the safety-related value of tire purchasing decisions.

- 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.**
 - h. requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances that would cause these collections to be collected 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.**

NHTSA published a 60-day notice on April 8, 2026, requesting comment on NHTSA's intention to submit this ICR to OMB for approval 91 FR 17828. NHTSA received no comments.

NHTSA published a 30-day notice on September 10, 2026, that stated NHTSA's intention to submit this ICR to OMB for approval (91 FR 57683).

- 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 given to any respondent in connection with these information collections

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

NHTSA provides no assurance of confidentiality under this information collection. All information submitted to NHTSA pursuant to 49 CFR 575.104 is considered public information. The purpose of the UTQGS program is to aid consumers in making informed purchasing decisions by ensuring that tire performance grades are publicly available and comparable across brands and tire lines. NHTSA is neither collecting nor maintaining confidential information under this collection. Accordingly, an assurance of confidentiality is neither necessary nor appropriate.

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

No questions of a sensitive nature are involved in these data collections.

- 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.

NHTSA estimates that approximately 160 tire brand names are subject to the Uniform Tire Quality Grading Standards (UTQGS) requirements under 49 CFR 575.104. Due to industry consolidation, approximately 45 manufacturers submit required materials on behalf of those brand names. For purposes of the information collection burden estimate, the respondents are the 45 manufacturer entities performing the required activities.

NHTSA estimates the total annual burden associated with this information collection to be 69,888 hours. To estimate the annualized labor cost associated with the burden hours, NHTSA used wage data from the Occupational Employment and Wage Statistics published by the Bureau of Labor Statistics. Three representative occupation groups were selected to approximate the mix of personnel involved in UTQGS compliance activities: production workers involved in tire labeling and mold preparation, technical staff responsible for engineering and product information, and administrative personnel responsible for documentation and submission of required materials².

Mean hourly wages for these occupations were adjusted to reflect total compensation (including benefits and overhead). BLS estimates that wages represent approximately 70.1 percent of total compensation for private industry workers³. Therefore, NHTSA adjusted wages using a factor of 1 / 0.701 to estimate fully loaded hourly labor costs. NHTSA then applied a weighted average reflecting the estimated distribution of labor across production (40 percent), technical (30 percent), and administrative (30 percent) personnel.

Estimated Labor Costs Associated with the Total Burden Hours

	BLS Mean Hourly Wage	Percent of Total Compensation	Loaded Wage	Weight	Weighted Rate
Production Occupations (51-0000)	\$22.90	70.1%	\$32.67	40%	\$13.07
Architecture & Engineering Occupations (17-0000)	\$47.64	70.1%	\$67.96	30%	\$20.39
Administrative Assistants (43-6014)	\$21.87	70.1%	\$31.20	30%	\$9.36
Estimated Blended Fully Loaded Hourly Rate:					\$48.92

Using this rate and the estimated 69,888 total annual burden hours, the estimated annualized

² May 2023 National Occupational Employment and Wage Estimates, United States. Production Occupations, Occupation Code 51-0000; Mean Hourly Wage = \$22.90. <https://www.bls.gov/oes/2023/may/oes510000.htm>. Accessed Mar. 6, 2026.

May 2023 National Occupational Employment and Wage Estimates, United States. Architecture and Engineering Occupations, Occupation Code 17-0000; Mean Hourly Wage = \$47.64. https://www.bls.gov/oes/2023/may/oes_nat.htm. Accessed Mar. 6, 2026.

May 2023 National Occupational Employment and Wage Estimates, United States. Secretaries and Administrative Assistants, Except Legal, Medical, and Executive, Occupation Code 43-6014; Mean Hourly Wage = \$21.87. <https://www.bls.gov/oes/2023/may/oes436014.htm>. Accessed Mar. 6, 2026.

³ <https://www.bls.gov/news.release/pdf/ecec.pdf>.

labor cost to respondents is:

69,888 hours × \$48.92 per hour = \$3,418,921.

The estimated hours burden of the UTQG information is composed of:

- a) Affixing paper labels to tires: NHTSA estimates that it takes approximately 1 second to affix a paper label to each replacement tire. Approximately 190 million replacement passenger car tires are sold annually in the United States. Multiplying 190 million labels by 1 second (0.00027778 hour) results in an estimated burden of 52,778 hours annually.
- b) Engraving molds: There are an estimated 60,000 passenger car tire molds used by tire manufacturers. NHTSA estimates that approximately one-third of these molds (20,000 molds) are newly placed into production each year. Each new mold requires UTQGS grading information to be engraved. NHTSA estimates that engraving UTQGS information requires 0.5 hours per mold, resulting in an estimated burden of 10,000 hours annually.
- c) Writing Brochure: NHTSA estimates that it takes approximately 150 hours annually to write or update a manufacturer's tire brochure. With approximately 45 manufacturer respondents, the estimated burden is 6,750 hours annually.
- d) Submitting grading information to NHTSA: Pursuant to 49 CFR 575.6(d)(2) and 575.104, manufacturers must submit copies of required UTQGS consumer information materials and associated grading information to NHTSA at least 30 days before making such materials available to prospective purchasers. Submissions are made annually, and manufacturers typically provide materials electronically. NHTSA estimates that it takes approximately 8 hours per manufacturer per year to compile, review, and electronically submit required grading information and brochures to the agency. Because approximately 45 manufacturers serve as submitting entities (on behalf of approximately 160 tire brand names), the total annual burden associated with submitting materials to NHTSA is estimated at: 45 manufacturers × 8 hours = 360 hours annually.

The estimated total annual burden hours associated with this information collection is displayed in the below table:

Activity	Respondents	Total Responses	Hours/Response	Total Burden Hours
Affix paper tread labels (190,000,000 labels × 1 sec each)	45	190,000,000	0.00027778	52,778
Engrave UTQGS on new tire molds (≈20,000 molds × 0.5 hr)	45	20,000	0.5	10,000
Write / update manufacturer brochures (150 hr × 45)	45	45	150	6,750

Compile & Submit Information to NHTSA	45	45	8	360
Total Annual Burden Hours				69,888

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 total annual non-labor respondent costs of approximately \$35.1 million, primarily attributable to testing, printing of paper tread labels, and printing of consumer information brochures. The largest portion of the cost burden imposed by the UTQGS program arises from the testing necessary to determine the grades that should be assigned to the tires. The cost burden is broken into its components as follows.

- a) Treadwear testing: There are approximately 125 convoys of 4 vehicles each that are run annually for 7,200 miles. NHTSA estimates it costs \$0.70 per vehicle mile including salaries, overhead, and reports. Thus, the treadwear testing cost is about \$20,160 per convoy (7,200 miles x 4 vehicles x \$0.70). This brings annual treadwear testing cost to \$2,520,000 (125 x \$20,160).
- b) Traction testing: It is estimated that 1,750 tires are tested annually with an estimated cost of \$45,000 for use of the government test facility. Using a factor of 3.5 times the \$45,000 to cover salary and overhead of test contractors, the estimated total cost of traction testing is \$157,500 (\$45,000 x 3.5).
- c) Temperature testing: A separate temperature grade testing for tires is required, since the test is no more an extension of the high-speed performance test of 49 CFR Part 571.109, which was required for safety certification. Effective in September 2007, Part 571.109 was replaced with Part 571.139 (Federal Motor Vehicle Safety Standard (FMVSS) No. 139) that has different test speeds.

For the temperature testing, it is estimated that 1,715 tires are tested annually with an estimated average cost per test of \$454. Therefore, the estimated UTQGS temperature annual testing is \$778,610 (1,715 x \$454)

- d) Printing paper tread labels: There are about 190 million replacement passenger car tires sold annually. Assuming, it costs \$0.15 for printing each label on gummed paper, the total cost is approximately \$28,500,000.
- e) Printing brochures: Assuming that 16.65 million brochures are printed annually and considering the cost of printing each brochure at \$0.19 (450 words per brochure x \$0.00042 per word), then multiplying 16.65 million brochures by \$0.19 to print each

brochure gives a cost burden of \$3,163,500.

The estimated related total annual respondent non-labor cost associated with this information collection is displayed in the below table:

Cost Category	Cost Component / Basis	Annual Cost	Notes / Basis
Respondent Non-Labor Testing	Treadwear testing	\$2,520,000	125 convoys × cost per convoy (\$20,160) = \$2,520,000
Respondent Non-Labor Testing	Traction testing	\$157,500	\$45,000 facility × 3.5 factor = \$157,500
Respondent Non-Labor Testing	Temperature testing	\$778,610	1,715 tests × \$454/test = \$778,610
Respondent Non-Labor Printing	Paper tread labels (190,000,000 × \$0.15)	\$28,500,000	Printing labels
Respondent Non-Labor Printing	Brochures (16.65M × \$0.19)	\$3,163,500	Printing brochures
Subtotal Respondent Non-Labor	Testing + Printing	\$35,120,000	Sum of non-labor items above

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.

Total estimated cost to the government for the information collection is \$6,350. The estimated cost in terms of government time is approximately 96 hours for the NHTSA staff person. Using the hourly wage of \$66.15 for a GS-13, Step 5, in Washington, DC⁴, the estimated cost of wages for the NHTSA staff person to process UTQGS submissions is \$6,350 (96 hours × \$66.15/hour).

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 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

⁴ https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/26Tables/html/DCB_h.aspx

estimates and the burden estimates from the last OMB approval.

This is a request for reinstatement of a previously approved information collection. The burden estimate has been revised to:

1. Clarify that approximately 45 manufacturers serve as respondents submitting materials on behalf of approximately 160 brand names; and
2. Include the burden associated with compiling and submitting required materials to NHTSA under 49 CFR 575.6(d)(2). It is estimated an increase of 360 additional annual hours. Accordingly, the total burden hours have decreased from 86,780 hours from previous collection to 69,888 hours.

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.

Information disclosed under UTQGS is not published for statistical analysis. UTQGS information is made available to consumers for informational and comparison purposes at the point of sale.

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 seeking approval to not display the expiration date for this collection because it is contained in a regulation and displaying the expiration date would require rulemaking.

18. Explain each exception to the certification statement identified in “Certification for Paperwork Reduction Act Submissions.” The required certifications can be found at 5 CFR 1320.9.

No exceptions to the certification statement are made.