

**Department of Transportation
National Highway Traffic Safety Administration
Information Collection Request Supporting Statements: Part A
49 CFR Part 575, Consumer Information Regulations (Sections 103 and 105)
OMB Control No. 2127-0049**

Abstract¹

The National Highway Traffic Safety Administration (NHTSA) seeks the Office of Management and Budget's (OMB) approval to reinstate a previously approved information collection (2127-0049) pertaining to 49 CFR Part 575 Sections 103 (Truck-camper loading) and 105 (Vehicle rollover).

Part 575.103, "Truck-camper loading," These regulations require manufacturers of light trucks that can accommodate slide-in campers to provide information on cargo weight rating and the longitudinal limits for center of gravity by affixing a label with identification and loading instructions, plus including more detailed guidance in the owner's manual.

Part 575.105, "Vehicle rollover," requires manufacturers of certain utility vehicles to affix a label in a prominent location alerting drivers that the handling and maneuvering characteristics of utility vehicles require special driving practices when these vehicles are operated.

Also, as required by 49 CFR Part 575.6(d)(1)(i), vehicle manufacturers must submit to NHTSA's Administrator, prior to new model introduction, two copies of the information specified in Part 575.103 and Part 575.105 that is applicable to the vehicles offered for sale. The information must be submitted at least 90 days before information on such vehicles is first provided for examination by prospective purchasers. The supporting statement addresses only the annual reporting hours and cost burdens associated with Section 103 (Truck-camper loading) and Section 105 ("Vehicle rollover").

This is a reinstatement with a change. The burden hours associated with this collection have increased; however, the burden cost has decreased. The total burden hours increased from 300 hours to 22,865 because this reinstatement counts labor hours for labeling each utility vehicle and slide-in camper in addition to submission-related activities. The burden costs to respondents have decreased from \$2,904,336 to \$1,579,550 due to more accurate estimates of the number of utility vehicles manufactured that require labels under Part 575.105.

A. Justification

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.

- 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.**

The National Traffic and Motor Vehicle Act authorizes the Secretary of Transportation (NHTSA by delegation), at 49 U.S.C. 30111, to FMVSS that set performance standards for motor vehicles and items of motor vehicle equipment. Further, the Secretary (NHTSA by delegation) is authorized, at 49 U.S.C. 30117, to require manufacturers to provide information to first purchasers of motor vehicles or items of motor vehicle equipment related to performance and safety in printed materials that are attached to or accompany the motor vehicle or item of motor vehicle equipment.

To carry out this statutory directive, the agency promulgated 49 CFR Part 575, Consumer Information Regulations. The regulation requires manufacturers to provide performance and safety information to their dealers who will distribute this information to potential first purchasers of new vehicles. These manufacturers also furnish the agency with copies. Every manufacturer of motor vehicles and motor vehicle equipment must provide NHTSA with performance and safety information and technical data to comply with the following:

- Truck-camper loading (information about trucks that can accommodate slide-in campers) (Section 575.103).

Vehicle rollover (information about handling and maneuvering characteristics of utility vehicles) (Section 575.105).

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

Vehicle manufacturers are required to provide truck-camper loading and utility vehicles information to three recipients: first purchasers of new vehicles, dealers selling the manufacturer's vehicles, and NHTSA.

A. First Purchasers of New Vehicles. Section 575.6(a) requires vehicle manufacturers to furnish the relevant consumer information to every first purchaser of a new vehicle. The information is either included in the owner's manual or printed on a separate document included with the owner's manual.

The information gives the first purchaser a permanent record of the vehicle's performance capabilities in different areas; therefore, a purchaser will know the safety performance and maneuvering limits of the vehicle. This information supplements the vehicle manufacturers' design efforts.

B. Dealers Selling the Manufacturer's Vehicles. Section 575.6 (c) requires vehicle manufacturers to freely provide sufficient quantities of this consumer information to dealers selling their vehicles. Dealers distribute the information to any prospective

purchaser. This information allows any prospective purchaser to compare vehicles' safety performance and uses.

C. NHTSA. Section 575.6(d) requires vehicle manufacturers to first furnish copies of its consumer information to the agency then to the public. This advance submission process helps guarantee that the information reaching the public is accurate, uniform, and reliable for vehicle comparisons and safety decisions.

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.**

NHTSA does not currently employ technological collection techniques for the consumer information requirements in 49 CFR Part 575, Sections 103 and 105. However, Part 575 does not impose any obstacles to using improved information technology to disseminate this information.

Manufacturers furnish sample copies of their consumer information materials directly to the agency, typically in hard copy, though electronic submissions are also accepted. Because the submissions consist of static, formatted disclosure materials intended for consumer distribution rather than data sets requiring automated processing, a more sophisticated electronic collection system would not meaningfully reduce burden or improve efficiency. The current submission process ensures NHTSA receives representative samples for compliance review and recordkeeping while imposing minimal burden on manufacturers.

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

NHTSA is the only agency that requires manufacturers to provide this consumer information to first purchasers of automobiles. This information becomes a permanent record of important safety performance and helps consumers to make purchasing decisions.

Truck-camper loading information. Without this regulation, neither NHTSA nor consumers would have access to any information similar to the truck-camper loading information.

Utility vehicles information. Without this requirement, consumers would otherwise be unaware of utility vehicles' handling and maneuvering limitations.

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

These consumer information requirements apply only to vehicle manufacturers, and NHTSA believes that few, if any, qualify as small entities. Each manufacturer provides the information once and updates it as necessary.

- 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 this consumer information was not available to vehicle purchasers, consumers would not know the safety performance and maneuvering limits of utility vehicles nor the slide-in camper capability of some light trucks.

- 7. Explain any special circumstances that require the collection to be conducted in 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 secret, 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 this collection 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 on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format, and on the data elements to be recorded, disclosed, or reported.**

On January 20, 2026, NHTSA published a 60-day notice requesting public comment on the proposed collection of information. No comments were received. On July 21, 2026, NHTSA published the corresponding 30-day notice.

NHTSA is in regular communication with manufacturers regarding this information. While NHTSA often provides explanations of how to comply with the requirements, NHTSA has not received feedback indicating that the process is burdensome or that NHTSA's estimates of burdens are incorrect.

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

No payment or gift is 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.

Assurance of confidentiality is neither desired nor necessary in this situation because all of the required information is intended to be accessible to any interested party.

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

No questions of a sensitive nature are involved in this information collection; therefore, no justification statements are necessary.

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 35 distinct manufacturers are subject to the requirements of 49 CFR Part 575, §§ 103 and 105, consisting of manufacturers of slide-in campers, manufacturers of trucks capable of accommodating slide-in campers, and manufacturers of utility vehicles. Of these, approximately 19 manufacturers are vehicle manufacturers that submit consumer information materials directly to NHTSA under § 575.6(d).

These manufacturers submit information only when introducing a new model or revising previously submitted materials. Based on prior years' experience, NHTSA estimates 15 total

submissions annually, requiring approximately 20 hours per submission, resulting in 300 annual burden hours for submissions.

Gathering data - 9.00hrs

Distributing data - 4.00hrs

Printing - 7.00hrs

Total burden hours per manufacturer 20.00hrs

In addition to submission hours, NHTSA accounts for the burden associated with affixing truck-camper loading labels (Part 575.103) and utility vehicle rollover labels (Part 575.105). NHTSA estimates that labeling 13,000 slide-in camper units and 4,500,000 utility vehicles requires approximately 22,565 hours annually (4,513,000 units $\times$ 0.005 hours per label).

The combined estimated total annual burden is therefore 22,865 hours (300 hours for submissions + 22,565 hours for affixing labels).

Based on Bureau of Labor Statistics wage rates, NHTSA estimates an average labor cost of \$58.12/hour² for professional and clerical staff performing submissions, and \$23.95/hour³ for workers affixing labels. These rates are derived from May 2024 National Occupational Employment and Wage Estimates published by the Bureau of Labor Statistics, using the mean hourly wage for Compliance Officers (Occupation Code 13-1041) and Laborers and Freight, Stock, and Material Movers, Hand (Occupation Code 53-7062), respectively, and converting wages to total compensation by dividing by 0.703⁴. This results in an estimated annualized labor cost of \$557,868 (\$17,436 for submissions + \$540,432 for labeling).

Burden Worksheet

Item	Responses	Burden Hours	Labor Cost
Manufacturer Submissions (49 CFR Part 575 §§ 103, 105)	15	300	\$17,436
Labeling – Affixing (slide-in campers + utility vehicles)	4,513,000	22,565	\$540,432
Total	4,513,015	22,865	\$557,868

2 May 2024 National Occupational Employment and Wage Estimates, United States. Business and Financial Operations Occupations, Compliance Officers, Occupation Code 13-1041; Mean Hourly Wage = \$40.86. https://www.bls.gov/oes/current/oes_nat.htm

. Accessed April 2, 2026. The total labor cost per hour is calculated by dividing the hourly wage (\$40.86) by 0.703, resulting in \$58.12/hour.

3 May 2024 National Occupational Employment and Wage Estimates, United States. Transportation and Material Moving Occupations, Laborers and Freight, Stock, and Material Movers, Hand, Occupation Code 53-7062; Mean Hourly Wage = \$16.83. https://www.bls.gov/oes/current/oes_nat.htm

. Accessed April 2, 2026. The total labor cost per hour is calculated by dividing the hourly wage (\$16.83) by 0.703, resulting in \$23.95/hour.

4 See Table 1 at <https://www.bls.gov/news.release/ecec.t01.htm>.

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.

The primary non-labor cost is printing. NHTSA estimates that each label costs \$0.35 to print. With approximately 4,513,000 labels annually, the total annual printing cost is \$1,579,550. Thus, the estimated total annual cost burden, exclusive of labor costs, is \$1,579,550.

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 annual cost to the Federal government for this information collection is \$27,235.

The estimated cost in terms of government time is approximately 416 hours annually for a Consumer Programs professional staff member responsible for receiving, reviewing, tracking, and maintaining manufacturer submissions required under 49 CFR Part 575 §§ 103 and 105.

Using the hourly wage of \$65.47⁵ for a GS-13, Step 5, in Washington, DC (2025), the estimated cost of wages is \$27,235 (416 hours × \$65.47/hour).

This estimate reflects staff time devoted to reviewing submissions for completeness, maintaining records, responding to manufacturer inquiries, and supporting internal compliance and program administration. No additional operational expenses, equipment costs, printing costs, or contractor support costs are incurred by the Federal government as a result of this collection.

To estimate total compensation costs, NHTSA used the Bureau of Labor Statistics estimate that wages and salaries represent approximately 61.7 percent of total employee compensation.

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

This collection is a reinstatement with a change. The change reflects adjustments to both burden hours and cost estimates. Earlier supporting statements accounted only for manufacturer submission hours (300 hours annually and \$2,904,366)). For this reinstatement, we are incorporating labor time and costs for affixing and printing labels.

⁵ https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/25Tables/pdf/DCB_h.pdf

The previous OMB-approved inventory reflected 300 burden hours and \$2,904,366 in annual cost burden. This reinstatement updates the methodology to separately account for labor hours and non-labor costs, consistent with current OMB guidance under the Paperwork Reduction Act. The updated estimate reflects 22,865 annual burden hours and \$1,579,550 in annual non-labor cost burden. The decrease in cost burden (–\$1,324,816) is primarily due to updated estimates of vehicle production volumes and the exclusion of labor costs from Question 13, which are now appropriately captured in Question 12.

- 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.**

This collection of information will not have results published for statistical use.

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

Approval is not sought to not display the expiration date for OMB approval.

- 18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions." The required certifications can be found at 5 CFR 1320.9.**

No exceptions to the certification statement are made.