

DEPARTMENT OF TRANSPORTATION
FEDERAL TRANSIT ADMINISTRATION (FTA)

SUPPORTING STATEMENT

Bus Testing Program
(OMB Control No. 2132-0550)

Justification

This is a request to revise the currently approved information collection associated with the Notice of Proposed Rulemaking (NPRM) to update 49 CFR Part 665, the Bus Testing Regulation. The NPRM, published on June 26, 2026 Vol. 91, No.122 (RIN 2132-AB40), proposes amendments and clarifications to the regulation intended to improve the efficiency of the testing program for stakeholders, enhance the utility and value of bus testing reports for FTA recipients, and facilitate the removal of obsolete test reports. The Office of Management and Budget (OMB) designated this NPRM as "non-significant".

1. Circumstances that make the collection necessary.

The Federal Transit Administration (FTA) Bus Testing Program is authorized by 49 U.S.C. § 5318, which mandates that any new bus model acquired with Federal financial assistance must be tested at an FTA-authorized facility. This statutory requirement ensures that new bus models meet specific performance standards for maintainability, reliability, safety, performance (including braking performance), structural integrity, fuel economy, emissions, and noise. Additionally, testing results must be used to assign a weighted aggregate score, providing a "pass/fail" rating for each bus model.

Collection of information is necessary for the following reasons:

- **Statutory Compliance:** Under 49 U.S.C. § 5318(e), Federal funds may not be obligated or expended for the acquisition of a new bus model unless that model has successfully completed the required testing at an authorized facility.
- **Recipient Certification:** 49 CFR § 665.7(a) requires that recipients of FTA financial assistance certify that any new bus model acquired with such funds has been tested in accordance with 49 CFR Part 665 and has received a passing test score prior to the final expenditure of federal funds. This certification necessitates that the manufacturer provides the required testing documentation.
- **Operational Requirements:** Manufacturers must submit technical specifications, component information, and other data to the testing facility to facilitate the testing process. This includes "Partial Testing" for previously tested bus models that have undergone major design or configuration changes.
- **Public and Industry Safety:** The Bus Testing Program serves a critical safety and fiscal oversight function. By requiring comprehensive testing before procurement, the program allows transit agencies and manufacturers to identify and resolve potential design defects and structural issues early. This process minimizes the risk of in-service failures that could lead to injury, property damage, significant maintenance costs, and service disruptions, thereby protecting both the public and taxpayer investments.

Currently, the Bus Testing Center is operated by The Thomas D. Larson Pennsylvania Transportation Institute (LTI) at The Pennsylvania State University under a cooperative agreement with the FTA. The information collected from manufacturers during the testing process is documented in official Bus Testing Reports, which verify compliance and provide transit agencies with objective data to inform their procurement decisions.

2. How, by whom, and for what purpose the information is to be used.

The Bus Testing Program was established to provide transit agencies with independent bus performance results, aiding in better procurement decisions. Without this program, transit agencies would have to depend on manufacturer-provided data, third-party information, results from their own pilot bus demonstrations, or shared experiences from other agencies regarding specific bus models. In the absence of a neutral testing program, there's a risk of lower-quality bus models entering the market, leading to increased life-cycle costs and diminished bus service quality.

This NPRM proposes amendments to the Bus Testing regulation at 49 CFR Part 665 to:

- Enhance clarity by defining previously undefined terms.
- Codify longstanding practices that are routine but not specified in current regulations.
- Improve testing quality.
- Alleviate regulatory burdens by relaxing some testing obligations.
- Provide flexibility to accommodate advancements in bus technology.
- Establish a 10-year expiration for Bus Testing Reports to ensure they accurately reflect current production models.

Additionally, the NPRM includes a Request for Information section aimed at gathering input from stakeholders on key bus testing issues that may be addressed in future rulemakings. While the FTA is not proposing changes to these issues at this time, stakeholder feedback may influence future modifications, including:

- Assumed passenger weights for ballasting test buses.
- Requirements for standing passenger floor space.
- Number of durability test miles accumulated at each simulated loading condition.
- New or modified test procedures that may be needed to test new transit bus technologies in the future.

FTA developed the Bus Testing Portal, an interactive on-line system available on the FTA website, designed for use by both FTA and TVM applicants/respondents to process requests for new bus model testing. This web-based portal streamlines the process for determining testing requirements and authorizing buses for testing at FTA's Bus Testing Center.

When a request for a Bus Testing determination and/or authorization is submitted, the portal automatically generates a task for a review by an FTA Bus Testing manager. FTA will document its decision in the system, which will then generate official responses to the applicant and the Bus Testing Center as confirmation of FTA concurrence. Key features of the portal include:

- Ability for users to complete and submit bus testing forms
- Ability for applicants to attach relevant documents
- Ability for users to save information intermittently, before final submission of the form

- Automated email notifications
- Ability for users to interact with FTA

Once they have incorporated all the necessary information into the portal, FTA will provide the testing determination results to the requester, and to the Bus Testing Facility operator if testing is authorized. If FTA determines that no testing is required, no additional information is collected for that request.

3. Consideration of improved information technology.

FTA's Bus Testing portal is a 100% web-based application that provides a "one-stop-shop" framework for:

- TVMs to submit requests for FTA to determine Bus Testing requirements for new or modified bus models
- FTA to review a TVM submission and ask any needed follow-up or clarification questions
- FTA to document its determination of testing requirements for a new or modified bus model
- FTA to document its authorization for the specified bus model to begin testing at the Bus Testing Center
- Notification to the Bus Testing Center that FTA has approved a specific test bus to begin the full or partial testing that FTA has determined will be required
- Archiving past determinations and authorizations in a searchable database

This interactive tool was created in 2019 as part of FTA's effort to reduce the time between application request and actual testing being done. The Bus Testing Portal User Guide has been included in this submission of this information collection with screenshots of the information respondents provide to FTA.

4. Efforts to identify duplication.

There is no duplication. No other entity currently conducts and documents comparable data from the testing of bus models. Currently, the test report is produced by LTI, which is the only place where all the test reports are kept on file. In addition, the Bus Testing Regulation seeks to minimize the burden on manufacturers by allowing, under certain circumstances, partial testing of previously tested bus models that subsequently have major changes.

5. Methods used to minimize burden on small businesses or other small entities.

There are not many bus or motorcoach manufacturers in the United States therefore and those that exist are not considered a small business. FTA does not anticipate any small businesses or entities applying or submitting test request through FTA's Bus Testing Program.

6. Consequences to federal program or policy activities if collection were conducted less frequently.

It is not possible to collect the information less frequently, since it is required by statute if FTA funds are to be used in the procurement of a bus model and is only collected when testing of a new bus model is requested.

7. Special circumstances that require the collection to be conducted in a manner inconsistent with 5 CFR 1320.6.

This information collection requirement is consistent with 5 CFR 1360.6.

8. Efforts to consult with persons outside the Agency to obtain their views.

The FTA Bus Program Manager attended the Mid-Sized Bus Manufacturers' Association meeting on October 15, 2024 and engaged stakeholders about the upcoming NPRM.

The NPRM associated with this information collection was published on June 26, 2026 (Vol. 91, No.122) RIN 2132-AB40.

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

No payment or gift is made to respondents.

10. Assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

49 CFR 665.13(b) states that upon completion of testing of a new bus model at the Bus Testing Center, the scored test results and resulting test report will be provided to the bus manufacturer or entity that entered a contract with the Center. The test report will be available to recipients only after both the bus manufacturer and FTA have approved it for release. If the bus manufacturer declines to release the report, or if the bus did not achieve a passing test score, the vehicle will be ineligible for FTA financial assistance.

49 CFR 665.13(f) states that, “the test report is the only information or documentation that will be made available publicly regarding any bus model tested at the facility.” The bus testing database makes it possible to obtain the same information that appears in the official bus testing reports in an electronic format online at <https://www.altoonabustest.psu.edu/bus-list.aspx>

11. Additional information for questions of a sensitive nature.

No sensitive information is required.

12. Estimate of hour burden of the collection of information and annualized cost to respondents.

Estimated Annual Number of Respondents: 84

Estimated Total Annual Burden: 3,019 hours

Frequency: Annually

The hourly burden and cost to respondents is driven by the information collected during the bus testing request process, the test scheduling request process, and the request for retesting for pass/fail compliance. FTA projects that bus manufacturers will submit 40 requests for determinations of testing requirements on new and modified bus models, and 20 requests for authorizations to begin full or partial tests or retesting because of complications during the test. If the rule goes into effect, FTA projects that manufacturers will submit an additional 12 requests for determination and authorization. Thus, the total number of respondents is 84. The estimated hourly burden to respondents is calculated by information collected during the bus testing request process in the following categories:

Test Determination $\wedge$ *Authorization Request* + *Test Scheduling Request* + *Request for Retesting* $\wedge$ *Address a Failed I*

$$2688 \text{ hrs} + 280 \text{ hrs} + 51 \text{ hrs} = 3019 \text{ total burden hours}$$

Test Determination and Authorization Request

As part of stakeholder outreach, FTA received feedback on the bus testing portal and their experience with the application request process and the time required to produce the information needed for submittal. The feedback on preparation time varied but the majority agreed that a good package containing only substantial data and thoroughly vetted through their internal processes would take at least a week. In this week, FTA estimates that the engineers would spend 16 hours preparing the package and that the attorneys would spend 16 hours reviewing and providing concurrence.

FTA used BLS' Occupational Employment and Wage Statistics as of May 2025 (<https://www.bls.gov/oes/>) to estimate fully burdened labor rates for engineers and attorneys, multiplied by 1.44 to account for fringe benefits for private industry workers.¹

- Mechanical engineers (BLS code 17-2141): $\$50.05 \times 1.44 = \72.07
- Lawyers (23-1011): $\$76.76 \times 1.44 = \110.53

The total estimated annual labor cost for this requirement is \$245,423, as shown in Table 1.

TABLE 1: Estimated Burden of the Test Determination and Authorization Request

Item	Labor Category (BLS code/title)	Labor Rate (\$/hr.)	Time (hrs.)	Annual Quantity of Requests	Total Annual Hours	Total Annual Cost (\$)
Testing Requirements Determination	17-2141 Mechanical Engineer	\$72.07	16	84	1,344	\$96,865

¹ Multiplier derived using Bureau of Labor Statistics data on employer costs for employee compensation as of March 2026 (<https://www.bls.gov/news.release/eccec.htm>). Median total employer compensation costs for private industry workers were \$34.78 an hour and include \$24.15 for wages and \$10.63 for benefit costs. To estimate full compensation costs from wages, one would use a multiplier of $\$34.78/\24.15 , or 1.44.

and/or Authorization Request	23-1011 Lawyer	\$110.53	16	84	1,344	\$148,558
Total Annual Test Determination and Authorization Request Burden					2,688	\$245,423

Test Scheduling Request

FTA estimates that a team consisting of a lawyer, an accountant, a mechanical engineer, and administrative personnel would need 10 hours of combined work to prepare the necessary documentation for each request.

The Bus Testing Program currently averages 16 tests per year; however, under the proposed rule, FTA anticipates this volume will increase. The economic analysis attributes the increase in burden to the introduction of a 10-year expiration for bus testing reports, a requirement not present under current regulations. According to the economic analysis, which projects the expiration of active bus testing reports from 2027 through 2036, FTA anticipates an average of 28 bus models will require retesting annually as these reports expire. FTA does not expect this provision to result in an increased frequency of failed tests, as the models undergoing retesting have already successfully completed the Bus Testing Program.

FTA estimated fully burdened labor rates for accountants and personnel using the same methodology for mechanical engineers and lawyers.

- Accountants and Auditors (BLS code 13-2011): $\$40.23 \times 1.44 = \57.93
- Administrative Personnel (43-3011): $\$33.41 \times 1.44 = \48.11

The total estimated annual labor cost for this requirement is \$26,874, as shown in Table 2.

TABLE 2: Estimated Labor Burden and Cost for the Test Scheduling Request

Item	Labor Category	Labor Rate (\$/hr.)	Preparation Time (hrs.)	Cost (\$)
	(BLS code/title)	(May 2025 BLS Statistic)		
Testing Contract	23-1011 Lawyer	\$110.53	1	\$110.53
Proof of Insurance	23-1011 Lawyer	\$110.53	1	\$153.68
Payment Check	13-2011 Accountant	\$57.93	1	\$78.36
Spare Parts Inventory List	17-2141 Mechanical Engineer	\$72.07	3	\$281.82
Bus Design Characteristics Information	17-2141 Mechanical Engineer	\$72.07	2.5	\$234.85
Assembling/Mailing of Test Scheduling Package	43-000 Office/Admin Support	\$48.11	1.5	\$91.94
Postage for package				\$8.63

Total burden per test request			10	\$959.81
Tests per year			28	
Total Annual Burden			280	\$26,874.80

Request for Retesting to Address a Failed Performance Standard

There is an additional paperwork burden associated with submitting information to FTA and the Bus Testing Facility operator for the retesting of a failed performance standard. Bus manufacturers will need to provide documentation to FTA on the failure analysis and provide a proposed corrective action report for bus models that fail to meet one or more of the proposed performance standards. FTA estimates that an average of three bus models will submit a request for retesting annually and that the proposed rule will not change the number of retesting requests. The total estimated annual labor cost for this requirement is \$3,663, as shown in Table 3.

TABLE 3: Estimated Burden and Cost for the Request of Retesting to Address a Failed Performance Standard

Item	Labor Category (BLS code/title)	Labor Rate (\$/hr.)	Preparation Time (hrs.)	Cost (\$)
Payment Check for Retesting Fees	13-2011 Accountant	\$57.93	0.5	\$28.97
Check Mailing	43-000 Office/Admin Support	\$48.11	0.5	\$24.06
Postage for package				\$15.00
Preparation of Failure Analysis and Modification Proposal	17-2141 Mechanical Engineer	\$72.07	16.0	\$1,153.15
Total burden per retest request			17.0	\$1,587.60
Tests per year			3	
Total Annual Burden (3 retest requests a year)			51.0	\$3,663.52

The total burden and cost are summarized in Table 4. The table below reconciles the totals from Tables 1, 2, and 3 based on the finalized calculations derived from the May 2025 BLS data and the updated program volume estimates. The total annual cost is **\$275,961.32**

TABLE 4: Total Estimated Annual Burden and Cost of the Bus Testing Program

Information Collection	Annual Burden (hr.)	Annual Cost (\$)
Test Determination and Authorization Request Process	2,688	\$245,423.00
Test Scheduling Request Process	280	\$26,874.80

Request of Retesting to Address a Failed Performance Standard	51	\$3,663.52
Total	3,019	\$275,961.32

13. Estimate of total annual cost burden to respondents or record keepers resulting from the collection of information (not including the cost of any hour burden shown in Items 12 and 14).

There is no additional cost beyond that shown in Items 12 and 14.

14. Estimate of annualized cost to the Federal government including contracts and IT.

The information collected by the Bus Testing Facility operator (LTI) to set up an individual bus model test program requires approximately 4 hours of Office/Administrative Support per test at a burdened rate of \$55.09 per hour, resulting in a cost of \$220.36 per test. For 16 tests per year, this creates a total annual cost of \$3,525.76. Because the FTA funds 80 percent of this cost, the annual federal share is \$2,820.61.

The time required for FTA to review and respond to requests varies based on complexity. Table 5 presents FTA's estimate of the average time and cost to respond to a request for a determination of testing requirements, while Table 6 presents the estimate for responding to a request for authorization to begin testing. These costs are calculated using the 2026 OPM salary rate for a GS-14, Step 5 (\$134.41/hr), adjusted by a 1.72 benefits multiplier for federal employees (<https://www.bls.gov/news.release/eccec.htm>).

Table 5: Annual Burden for FTA Testing Requirements Determinations
Salary Table 2026 with DC-MD-VA-WV-PA [DCB h.pdf](#)

Item	Labor Category	Labor Rate (mid-point)	Time	Cost
Review and Analysis	General Engineer, GS-14 – Step 5	\$134.41	6	\$806.46
Drafting Response	General Engineer, GS-14 – Step 5	\$134.41	3	\$403.23
Legal Review	Attorney-Advisor, GS-14 – Step 5	\$134.41	3	\$403.23
Revision	General Engineer, GS-14 – Step 5	\$134.41	1	\$134.41
Formatting and Sending	General Engineer, GS-14 – Step 5	\$134.41	0.5	\$67.20
Record Keeping	General Engineer, GS-14 – Step 5	\$134.41	0.25	\$33.60
Total burden per determination request			13.75	\$1,848.13
Annual Determination Request			40	N/A
Total annual burden			550	73,925.20

Table 6: Annual Burden for FTA Testing Authorization Requests

Item	Labor Category	Labor Rate (mid-point)	Time	Cost
Review and Analysis	General Engineer, GS-14 – Step 5	\$134.41	2	\$268.82
Drafting Response	General Engineer, GS-14 – Step 5	\$134.41	1	\$134.41
Formatting and Sending	General Engineer, GS-14 – Step 5	\$134.41	0.5	\$67.20
Record Keeping	General Engineer, GS-14 – Step 5	\$134.41	0.25	\$33.60
Total burden per authorization request			3.75	\$504.03
Annual Authorization Request			20	N/A
Total annual burden			75	10,080.60

In addition to the labor costs, approximately \$3,000 has been set aside in contractor fees to operate and maintain the Bus Testing Portal.

Component	Annual Cost (\$)
LTI Administrative Support (Federal Share)	\$2,820.61
Testing Requirements Determinations	\$73,925.20
Testing Authorization Requests	\$10,080.60
Bus Testing Portal Contractor Fees	\$3,000.00
Total Annual Federal Cost	\$88,645.74

15. Explain the reason for any program changes or adjustments reported in Items 13 or 14 of OMB Form 83-I.

This is a request for a revision associated with a proposed rulemaking

16. Plans for tabulation and publication for collections of information whose results will be published.

The database of bus resting reports is available on LTI's website at [Bus Research and Testing Center | Penn State Engineering](#)

17. If seeking approval not to display the expiration date for OMB approval, explain the reasons.

There is no reason not to display the expiration date of OMB approval.

18. Explain any exception to the certification statement identified in Item 19 of OMB Form 83-I.

There are no exceptions.

B. Collections of information employing statistical methods.

FTA does not utilize statistical methods to collect the bus testing program information.