

**Tire Pressure Monitoring System – Outage Rates and Repair Costs (TPMS-ORRC)**

**Supporting Statement for Information Collection Request**

**Part A**

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**TABLE OF CONTENTS**

**SUPPORTING STATEMENT A**

**A. Justification.....1**

**A.1. Explain the circumstances that make the collection of information necessary.....1**

**a. Circumstances necessitating the data collection.....1**

**b. Statute authorizing the collection of information.....2**

**A.2. Indicate how, by whom, and for what purpose the information is to be used.....2**

**A.3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques.....4**

**A.4. Describe efforts to identify duplication.....4**

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

**A.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.....6**

**A.7. Explain any special circumstances that would cause the information collection to be conducted in a manner inconsistent with the guidelines set forth in 5 CFR 1320.6.....6**

**A.8. 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.....6**

**A.9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.....7**

**A.10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.....7**

**A.11. Provide additional justification for any questions of a sensitive nature,.....7**

**A.12. Provide estimates of the hour burden of the collection of information.....7**

**A.13. Provide an estimate of the total annual [non-hour] cost burden to respondents.....9**

**A.14. Provide estimates of annualized cost to the Federal government.....10**

**A.15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.....10**

<b>A.16. For collections of information whose results will be published, outline plans for tabulation, and publication.....</b>	<b>10</b>
<b>A.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....</b>	<b>10</b>
<b>A.18. Explain each exception to the certification statement identified in Item 19, Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-1.....</b>	<b>11</b>
<b>ATTACHMENTS.....</b>	<b>11</b>
<b>A. Statutory Authority.....</b>	<b>11</b>
<b>1. TREAD Act.....</b>	<b>11</b>
<b>2. FMVSS 138.....</b>	<b>11</b>
<b>3. Executive Order 13563.....</b>	<b>11</b>
<b>4. The National Traffic and Motor Vehicle Safety Act of 1966.....</b>	<b>11</b>
<b>5. The Highway Safety Act of 1966.....</b>	<b>11</b>
<b>B. Federal Register Notices.....</b>	<b>11</b>
<b>1. 60-Day Federal Register Notice.....</b>	<b>11</b>
<b>2. 30-Day Federal Register Notice.....</b>	<b>11</b>
<b>C. Data Collection Forms.....</b>	<b>11</b>
<b>1. Vehicle Inspection Form.....</b>	<b>11</b>
<b>2. Drivers Interview Form.....</b>	<b>11</b>
<b>3. Suppliers Survey Form.....</b>	<b>11</b>
<b>4. Repair Facilities Survey Form.....</b>	<b>11</b>

**Tire Pressure Monitoring System – Outage Rates and Repair Costs (TPMS-ORRC)  
Supporting Statement for Information Collection Request**

Approval is requested to conduct information collections for the project, entitled “the *Tire Pressure Monitoring System – Outages Rates and Repair Costs (TPMS-ORRC)*”.

**A. Justification**

**A.1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

**a. Circumstances necessitating the data collection.**

Improperly inflated tires pose a safety risk, increasing the chance of skidding, hydroplaning, longer stopping distances, and crashes due to flat tires and blowouts. Section 13 of the Transportation Recall Enhancement, Accountability, and Documentation (TREAD) Act (Attachment A1), which Congress passed on November 1, 2000, directed NHTSA to conduct rulemaking actions to revise and update the Federal motor vehicle safety standards for tires, to improve labeling on tires, and to require a system in new motor vehicles that warns the operator when a tire is significantly underinflated.

Tire Pressure Monitoring Systems (TPMS) were mandated in Federal Motor Vehicle Safety Standard (FMVSS) No. 138 (Attachment A2), so that drivers are warned when the pressure in one or more of the vehicle’s tires has fallen to 25 percent or more below the placard pressure, or a minimum level of pressure specified in the standard, whichever pressure is higher, and may be informed about which of the four tires is underinflated. As of September 1, 2007, after a phase-in period beginning on October 5, 2005, TPMS was required on all new light vehicles (i.e., passenger cars, trucks, multipurpose passenger vehicles, and buses with a gross vehicle weight rating of 10,000 pounds or less, except those vehicles with dual wheels on an axle).

Executive Order 12866 (Attachment A3) requires Federal agencies to evaluate their existing regulations and programs and measure their effectiveness in achieving their objectives. Since the phase-in of TPMS, there has been only one evaluation of TPMS. The TPMS-SS (OMB #2127-0626) was conducted in 2011, as a special study through the infrastructure of the National Automotive Sampling System (NASS), to collect nationally representative data on how effective TPMS was in reducing underinflation in the on-road fleet of passenger vehicles. Analysis of the survey results indicated that direct TPMS is 55.6-percent effective at preventing severe underinflation as defined in FMVSS No. 138. However, effectiveness was substantially lower in vehicles that were 6-7 years old at the time of the survey. One explanation as to why this is true was the possibility that the drivers of these older vehicles were not taking all the maintenance actions (e.g., adding TPMS sensors to new vehicle tires, replacing non-functioning sensors on current tires, having the system properly re-set when needed) that were needed in order to insure

that they had functioning TPMS. Relevant data is needed to examine why the effectiveness of TPMSs in older vehicles is reduced and what can be done to increase it.

**b. Statute authorizing the collection of information**

Transportation Recall Enhancement, Accountability, and Documentation (TREAD) Act, Section 13, directs NHTSA to conduct rulemaking actions to revise and update the Federal motor vehicle safety standards to require a system in new motor vehicles that warns the operator when a tire is significantly underinflated. (See Attachment A1 for full text.)

Federal Motor Vehicle Safety Standard (FMVSS) No. 138 mandates Tire Pressure Monitoring Systems (TPMS). (See Attachment A2 for full text.)

Executive Order 13563 requires Federal agencies to periodically review their existing significant regulations to determine whether any such regulations should be modified, streamlined, expanded, or repealed so as to make the agency's regulatory program more effective or less burdensome in achieving the regulatory objectives. (See Attachment A3 for full text.)

The National Traffic and Motor Vehicle Safety Act of 1966, re-codified under Title 49 of the United States Code, Chapter 301, Subchapter V, Section 30181, gives the Secretary authorization to conduct research, testing, development, and training as authorized to be carried out by subsections of this title. (See Attachment A4 for full text.)

The Highway Safety Act of 1966 (P.L. 89-564), re-codified under Title 23 of the United States Code, Chapter 4, Section 403, gives the Secretary authorization to use funds appropriated to carry out this section to conduct research and development activities on all aspects of highway and traffic safety systems and conditions relating to vehicle, highway, driver, passenger, motorcyclist, bicyclist, and pedestrian characteristics. Section 403 further gives the Secretary authorization to conduct research and development activities with respect to human behavioral factors and their effect on highway traffic safety. Section 403 also authorizes the Secretary to conduct an evaluation of the effectiveness of countermeasures to increase highway and traffic safety. (See Attachment A5 for full text.)

**A.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.**

**Previous Data Collections.** The agency used information obtained from the 2001 Tire Pressure Special Study (TPSS) and the 2003 Tire Pressure Monitoring System Study (TPMSS) in developing Federal Motor Vehicle Safety Standard (FMVSS) No. 138, which mandates Tire Pressure Monitoring Systems (TPMS) in all new light vehicles. Staff analyzed the nationally representative 2011 TPMS-SS survey data (i.e., data on tire inflation for vehicles with and without TPMS) to evaluate the effectiveness of TPMS in preventing under-inflated tires.

**Information Use.** While TPMS effectiveness was showed to decrease in older vehicles, the reason for this decrease could not be determined from the data collected. Additional information (e.g., rate of TPMS non-functioning, cost of repairs, consumers' habits and beliefs related to non-functioning TPMSs) is needed in order for NHTSA analysts and engineers to: (1) calculate the number of TPMSs in the total fleet that do not have a functioning TPMS, (2) determine the

reasons drivers do or do not keep their TPMSs in good functioning order, and (3) assess the usefulness of providing consumers with additional information on TPMSs as a means of increasing the number of vehicles with functioning TPMSs.

Information Collection. This information collection will be completed via three separate surveys:

Field Survey of Drivers and Vehicles. A purposefully selected convenience sample survey, conducted in eight sites (two sites in each of 4 states—Colorado, Texas, Washington, and Virginia), will perform at least 7,000 inspections of passenger vehicles of all model years from 2004 through the current model year, as well as interviews of 700 drivers of those vehicles. Focus will be on assessing the operating status of the TPMS in these vehicles and interviewing drivers of vehicles with TPMSs that are and are not functioning, regarding their knowledge about, and habits related to, the TPMS in their vehicle. (A pilot study will be conducted prior to the full field survey.)

Suppliers Survey. Approximately 45 major suppliers of TPMS sensors and systems will initially be contacted in person or by telephone with an option of providing a hard copy response by email, mail, or fax. Focus will be on TPMS repair and maintenance issues, as well as cost factors.

Repair Facilities Survey. A sample of 500 repair/maintenance facilities (e.g., automobile dealerships, tire chain stores, small service stations with attached repair shops) will be selected for a Computer-Assisted Telephone Interview (CATI), with the option of responding by mail, based upon the respondent's preference. Focus will be on assessing the lifespan of TPMS, common sources of TPMS malfunction, typical costs to repair/replace malfunctioning systems, and the factors considered by customers when deciding whether to repair or replace TPMSs that are not working.

Survey Forms. There are 4 forms that are being used to collect data for the three surveys. They are:

Field Survey of Drivers and Vehicles. Two forms will be used to obtain information regarding vehicle characteristics, and driver knowledge. These forms are:

*Vehicle Inspection.* One form, the vehicle inspection form, will be completed via observation by one data collector while another data collector conducts an in-person interview with the driver. The Vehicle Inspection form will be used to obtain information about the vehicle make, model, odometer reading, and TPMS status.

*Drivers Interview.* The first part of this in-person interview form serves as a screener for the drivers of all 7,000 vehicles that are approached. Information collected will determine whether an individual driver will be one of the 700 drivers that are administered the second part of the interview form, which is an in-depth interview. The screener part of the drivers interview form will be used to collect information required to sort the vehicles into the following groups: (1) Vehicles not meeting the selection criteria for inspection; (2) Vehicles meeting the selection criteria for inspection, but for which no additional interviewing is required; (3) Vehicles meeting

the selection criteria for both inspection and additional interview questions. These additional questions will be used to obtain information regarding driver knowledge about current or past TPMS malfunctions (e.g., duration and frequency of the TPMS not working, reasons they did not work, actions taken to fix them, the costs associated with repairing them).

Suppliers Survey. One interview form will be used to obtain information from suppliers of TPMS equipment.

Repair Facilities Survey. One interview form will be used to obtain information from businesses that repair TPMS.

**A.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. Also describe any consideration of using information technology to reduce burden.**

These collections of information will mainly use electronic methods of collecting data from in-person or telephone interviews. For the first survey (i.e., in-person interviews of 700 drivers and the inspection of 7,000 vehicles), data will be collected through the use of hand-held electronic devices. For the second survey (i.e., major suppliers), information will be collected via email, mail, or fax with telephone contact being used as needed. For the third survey (i.e., 500 repair facilities), data will primarily be collected via Computer Assisted Telephone Interviewing (CATI), but will also be collected via hard copy mail-in survey forms, if so requested by the respondents.

There are a number of benefits to using hand-held electronic devices and the CATI system. Certain type of errors, which are more likely to happen when data collection is done manually by interviewers (e.g., not following the correct sequencing or skip pattern of questions, accepting invalid responses or data entries), are eliminated or greatly reduced, at the same time that interview time/ burden for the respondents is reduced. Also, data is entered directly into the computer's memory, eliminating the need for a later labor intensive data entry process that can introduce additional errors. Finally, survey supervisors have complete and immediate data with which to track the progress of the data collection process and the quality of the data being collected.

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

NHTSA has conducted three studies about TPMS. The first of these was conducted in 2001, but the study sample included too few vehicles equipped with tire pressure monitoring systems to perform a thorough analysis. A second study was begun in 2003 but was truncated. The third study (i.e., TPMS-SS) was conducted in 2011 to collect data on tire pressure and TPMSs. It also obtained data on consumers' knowledge and habits (e.g., how properly functioning TPMSs

worked, how and when to add air to vehicle tires); however, almost all of this data was collected about the drivers' actions toward working TPMS systems and not about their actions toward non-functioning systems. In addition, data on the cost and difficulty in replacing/repairing non-functioning systems was not collected.

NHTSA has also completed Internet searches for studies on consumers' reactions to the non-functioning of their TPMSs, but has not found any studies that address this topic. J.D. Power and Associates, through its independently funded surveys, has been providing information on dealer attitudes and customer satisfaction since the 1970s. In 2010, they conducted a survey about tires and TPMS, but the released survey data did not include information about consumers' reactions to non-functioning TPMS. Overseas, Tns sifo, a Swedish company that conducts opinion polls and other social research, conducted a survey of Swedish drivers for NIRA Dynamics, a Swedish manufacturer of indirect TPMSs. The results of the survey were presented in a PowerPoint presentation entitled, "Tire Pressure and TPMS Consumer Practice," which was given at the Vehicle Dynamics Expo 2012 on June 13. While the survey did not explicitly cover the non-functioning of TPMS, it did cover related topics (i.e., drivers' knowledge about TPMS and willingness to spend funds on buying and maintaining them); however, since only Swedish drivers were interviewed, one cannot be certain that American drivers would have the same knowledge and opinions.

In contrast to previous research on TPMS, this information collection request represents a more comprehensive investigation of TPMS systems by engaging the general public, suppliers, and professional establishments involved in TPMS repair. This robust investigation will answer key questions concerning the operational status of TPMS systems, consumers' attendant knowledge, attitudes, and awareness of TPMS systems, and the causes and costs of TPMS system malfunction.

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

**Field Survey of Drivers and Vehicles.** The collection of information for this survey involves drivers of selected vehicle types, not small businesses. Potential survey sites, gas stations, will be contacted in advance to see if they would be willing to voluntarily grant permission to conduct the survey at their establishment. Businesses will be fully informed as to the nature of the survey operations, as well as the amount of time required for the data collection activities.

**Suppliers Survey/Repair Facilities Survey.** The collection of information for these two surveys will involve businesses of all sizes, including small businesses. These businesses will be contacted in advance, informing them of the survey's purpose and that they will be contacted in the near future. Burden will be minimized by (1) allowing respondents to select the most convenient method of providing the information collected (i.e., CATI interview or completing a hard copy of the survey form), and (2) providing a number of different ways that the respondent can obtain additional information about the study and/or help in answering the survey questions (i.e., directly asking the interviewer, calling a toll-free help desk, obtaining assistance via email).

**A.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.**

FMVSS 138 mandated that all light vehicles have TPMS by November 2007; therefore, the initial vehicles required to have TPMS will be nine years old in November 2014. The Agency does not have any hard data as to the exact life of the batteries that are used in the TPMSs, but it has been estimated that batteries will begin to fail in about eight years. The agency needs data about what to expect in the next few years as more and more of the TPMS batteries fail (e.g., the extent of the problem, how consumers will react to this problems, possible Agency actions that could be taken to diminish any problems that develop). NHTSA knows of no previous study that evaluates the effects of non-functioning TPMSs upon consumers' ability to track tire inflation with their TPMSs. Consequently, if this study is not conducted, real-world data to evaluate the effect of non-functioning TPMSs on Federal Motor Vehicle Safety Standard (FMVSS) 138 would not be available. In addition, if NHTSA does not collect this information, it will not have scientifically-based information from actual motorists on the use of TPMS with which to better target Agency outreach efforts.

**A.7. Explain any special circumstances that would cause the information collection to be conducted in a manner inconsistent with the guidelines set forth in 5 CFR 1320.6.**

There are no circumstances requiring information to be collected in a manner inconsistent with the guidelines in 5 CFR 1320.6.

**A.8. 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 these comments. Describe efforts to consult with persons outside the agency to obtain their views.**

**FEDERAL REGISTER NOTICES:**

A copy of the 60-Day Federal Register Notice is provided in Attachment B1. The Notice appeared in the Federal Register, Volume 79, Number 129, pages 38358-38360, Monday, July 7, 2014. The closing date for comments was September 5, 2014. No comments were received.

A copy of the 30-Day Federal Register Notice is provided in Attachment B2. The Notice appeared in the Federal Register, Volume 80, Number 8, pages 1691-1692, Tuesday, January 13, 2015.

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

No payment will be made to respondents in the survey.

**A.10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

In letters to respondents for each of the three surveys, we only promise that the data will be kept private, used for statistical purposes, and will be protected to the full extent of the law. This is because we do not have a statute that expressly guarantees confidentiality for most of the data that we are collecting in the TPMS-ORRC.

However, we allow respondents in the Suppliers Survey to request confidentiality for the portions of their responses that they consider to be confidential business information (CBI) under our normal confidentiality procedures set forth at 49 CFR part 512. The statutory authority for 49 CFR part 512, as stated in the CFR, is 49 U.S.C. 322; 5 U.S.C. 552; 49 U.S.C. 30166; 49 U.S.C. 30167; 49 U.S.C. 32307; 49 U.S.C. 32505; 49 U.S.C. 32708; 49 U.S.C. 32910; and 49 U.S.C. 33116; delegation of authority at 49 CFR 1.50. 49 CFR part 512 is available online at <http://www.gpo.gov/fdsys/pkg/CFR-2014-title49-vol6/pdf/CFR-2014-title49-vol6-part512.pdf>. Under part 512, respondents can still send completed survey forms to our contractor with the claimed CBI redacted, and send the CBI to NHTSA's Office of Chief Counsel.

**A.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.**

The survey does not contain any questions related to matters that are commonly considered sensitive or private.

**A.12. Provide estimates of the hour burden of the collection of information on the respondents. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

Consultation with a sample (fewer than 10) of potential respondents was completed. Scenario role-playing was performed to estimate the burden of each instrument. Pairs of interviewers conducted mock interviews under various scenarios to simulate potential interview experiences.

Field Survey of Drivers and Vehicles. While there are two forms, only one of them (i.e., Drivers Interview Form) will place burden on the respondents (i.e., the vehicles' drivers). The other form (i.e., Vehicle Inspection Form) does not place burden on the respondents, as it is completed via observation. One data collector will conduct an in-person interview with the drivers to

## Part A for NHTSA ICR for TPMS-ORRC

collect information on the Drivers Interview Form, while the other data collector will complete the Vehicle Inspection Form via observation.

A pilot study in one site will be conducted to test and improve data collection procedures and instruments, as well as to obtain information about the real world rate of malfunction in vehicles with TPMS. Currently, there is not any data on the real world rate of TPMS with malfunctioning systems, but about 5 percent of the respondents in the 2011 TPMS-SS survey were aware of experiencing, at some time, a TPMS malfunction. For this request, we are using a conservative estimate of a 3.4% rate of vehicles with malfunctioning TPMS to ensure that we request sufficient burden hours. Accordingly, we would need to screen around 150 vehicles in the pilot test to obtain 100 completed interviews, of which 3-4 would be for vehicles with malfunctioning systems.

Based upon the pilot study results, revisions to the main survey project plan will be made, but until then, we will use this same conservative estimate of a 3.4% rate of vehicles with malfunctioning TPMS. For this request, it is estimated that the burden for the Drivers Interview Form will be around 5 minutes to screen around 10,000 vehicles and slightly over 10 minutes to obtain additional information from 700 drivers (i.e., 350 with malfunctioning or disabled TPMS and 350 with low tire pressure or no problems). If the malfunctioning TPMS rate is higher than 3.4%, fewer vehicles will need to be screened to obtain the required 350 completed interviews with drivers of vehicle with malfunctioning TPMSs, and, therefore, fewer burden hours will be needed.

During the pilot study, it may take longer for the data collectors to screen vehicles and to conduct the interviews, as they are becoming better acquainted with the survey forms; therefore, it is estimated screening will take around 6 minutes and full interviews will take slightly over 11 minutes. In addition, for both the main survey and the pilot test, the estimated burden for each non-interview (i.e., time to request cooperation of drivers who do not agree to participate in the survey) will be around two minutes. Consequently, the total respondent burden hours for the main survey and the pilot study is estimated to be 1,154 hours (i.e., 30 burden hours for the pilot and 1124 burden hours for the main study).

Suppliers Survey. The average time to collect data on the cost of TPMS parts and systems will be slightly over 20 minutes for each completed interview and up to 9 minutes per supplier with whom follow-up is needed to obtain clarification. For this estimate, we are assuming a supplier response rate of 100 per cent, along with the need to do follow-up at a rate of 25 per cent per initial interview, for a total respondent burden to be 17 hours.

Repair Facilities Survey. The average time to collect data on the types and costs of repairing TPMS will be around 5 minutes for each respondent who does not agree to participate, slightly over 20 minutes for each completed interview, and around 9 minutes per respondent for any follow-up that is needed to obtain clarification. Five hundred facilities will initially be contacted with additional facilities to be contacted until a minimum of 100 completed interviews are obtained. To ensure that sufficient burden hours are requested, we are using a liberal estimate of a 93 per cent return rate (i.e., 465 completed interviews), even though we expect we will only obtain a 20 per cent response rate (i.e., 100 completed interviews). In addition, we are assuming

the need to do follow-up at a rate of 25 per cent per interview, with the total respondent burden for the Repair Facilities Survey estimated to be 183 hours. If the response rate is lower than 93 per cent, fewer facility interviews will be conducted and fewer burden hours would be needed.

All Three Surveys—Burden Hours and Cost. The overall burden hours for all three surveys is estimated to be 1,354 hours (i.e., 1,124 hours in the Drivers Survey, 30 hours for the pilot of the Drivers Survey, 17 hours in the Suppliers Survey, and 183 hours in the Repair Facilities Survey). This estimated total of 1,354 hours is 211 hours less than what was initially projected in the 60-Day Notice (i.e., when we were considering having the pilot test in all eight, rather than only one site).

If the cost to the respondents of their voluntary hours can be looked at in terms of an hourly wage based upon the average income level in the United States, the Mean Hourly Wage Estimate of \$22.33 per hour (U.S. Dept. of Labor, Bureau of Labor Statistics, 2013) can be used to estimate annualized costs to respondents at 1,124 hours x \$22.33 = \$25,099 for the Drivers Interview Form in the main survey; 30 hours x \$22.33 = \$670 for the Drivers Interview Form in the pilot test; 17 hours x \$22.33 = \$380 for the Suppliers Form, 183 hours x 22.33 = \$4,086 for the repair facilities form, and 1,354 hours x \$22.33 = \$30,235 for all three forms together. (See Table 1 below)

**Table 1. Cost Burden on Respondents**

Survey Forms	Hours	Cost per Hour	Total Cost
Field Survey (main)	1,124	\$22.33	\$25,099
Field Survey (pilot)	30	\$22.33	\$670
Suppliers	17	\$22.33	\$380
Repair Facilities	183	\$22.33	\$4,086
<b>TOTAL</b>	<b>1,354</b>		<b>\$30,235</b>

\*From [http://www.bls.gov/oes/current/oes\\_nat.htm#b00-0000](http://www.bls.gov/oes/current/oes_nat.htm#b00-0000), all occupations, Mean Hourly Wage Estimate for May 2013; viewed June 18, 2014.

**A.13. Provide an estimate of the total annual [non-hour] cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).**

Field Survey of Drivers and Vehicles. There are no costs to respondents or record keepers associated with participating in this survey. For the Drivers Survey, respondents will be asked questions regarding their TPMSs, and all responses will be provided spontaneously. For the vehicle inspection, data will be obtained via observation.

Suppliers Survey/Repair Facilities Survey. There are no costs to respondents or record keepers associated with participating in these surveys. Information is only requested about records that the respondents already are keeping for their own purposes.

**A.14. Provide estimates of annualized cost to the Federal government.**

The total estimated cost to the government for conducting the survey is \$594,249.00, the cost of a procurement awarded to ICF to complete the work. Costs of the project will be concentrated within a two year period, making the annual cost to the government to be \$297,125.

**A.15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.**

This is a reinstatement with change. The changes are due to agency discretion. While the last TPMS survey conducted was a national survey that had approval for 1925 burden hours, this TPMS survey (i.e., TPMS-ORRC) is not a national survey and only 1354 burden hours are needed. TPMS-ORRC will focus on the issue of malfunctioning TPMS, which is expected to be a rare event, and a modified main survey and three new smaller surveys are planned, in order to obtain a comprehensive study of this issue. The modified TPMS main survey (i.e., “TPMS-ORRC, Field Survey”) requires 801 fewer burden hours than the last TPMS survey (i.e.,  $1925 - 1124 = 801$ ), while the three new ICs will require an additional 230 burden hours-- a pilot study for the Field survey (30 hours), a survey of suppliers of TPMS parts and systems (17 hours), and a survey of facilities that repair TPMS in passenger vehicles (183 hours)—with the overall request being 571 fewer burden hours than the last TPMS survey (i.e.,  $1925 - 1354 = 571$ ).

**A.16. For collections of information whose results will be published, outline plans for tabulation, and publication.**

NHTSA plans to publish an evaluation report, which includes the findings and the methodology used. Frequencies will be computed for each of the questions in the survey. Cross-tabular analyses of the survey data by population subgroups, such as age and gender, and key analytical variables will also be conducted.

Findings will be disseminated through internal briefings, as well as through printed technical reports, which will be posted on NHTSA’s website.

Resulting publications will include a caveat that data for the Drivers Survey were collected from a sample of drivers in four states, and that the results cannot be generalized to the population of American drivers.

**A.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.**

The expiration date for OMB approval will be displayed on all survey forms. NHTSA is not seeking approval to not display the expiration date.

**A.18. Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-1.**

No exception is requested to any of the items in the certification statement.

**ATTACHMENTS**

**A. Statutory Authority**

1. TREAD Act
2. FMVSS 138
3. Executive Order 13563
4. The National Traffic and Motor Vehicle Safety Act of 1966
5. The Highway Safety Act of 1966

**B. Federal Register Notices**

1. 60-Day FR Notice
2. 30-Day FR Notice

**C. Data Collection Forms**

1. Vehicle Inspection Form
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