

**SUPPORTING STATEMENT**Records of Tests of Examinations of Personnel Hoisting Equipment

30 CFR Section 56.19022	Initial Wire Rope Diameter Measurements at Surface Metal and Nonmetal Mines
30 CFR Section 56.19023	Wire Rope Examinations and Tests at Surface Metal and Nonmetal Mines
30 CFR Section 56.19121	Personnel Hoisting Equipment at Surface Metal and Nonmetal Mines
30 CFR Section 57.19022	Initial Wire Rope Examinations and Tests at Underground Metal and Nonmetal Mines
30 CFR Section 57.19023	Wire Rope Examinations and Tests at Underground Metal and Nonmetal Mines
30 CFR Section 57.19121	Personnel Hoisting Equipment at Underground Metal and Nonmetal Mines
30 CFR Section 75.1400-2	Safety Catches at Underground Coal Mines
30 CFR Section 75.1400-4	Personnel Hoisting Equipment at Underground Coal Mines
30 CFR Section 75.1432	Initial Wire Rope Diameter Measurements at Underground Coal Mines
30 CFR Section 75.1433	Wire Rope Examinations and Tests at Underground Coal Mines
30 CFR Section 77.1404	Personnel Hoisting Equipment at Surface Coal Mines
30 CFR Section 77.1432	Initial Wire Rope Diameter Measurements at Surface Coal Mines
30 CFR Section 77.1433	Wire Rope Examinations and Tests at Surface Coal Mines
30 CFR Section 77.1906	Hoisting Equipment at Coal Mine Slope and Shaft Sinking Operations

## A. Justification

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.

These requirements provide for a record of specific tests and inspections of a mine's personnel hoisting system, including the wire rope, to ensure that the system remains safe to operate. Review of the record indicates whether deficiencies are developing in the equipment, in particular the wire rope, so that corrective action may be taken before an accident occurs. The requirements also provide for a systematic procedure for the inspection, testing, and maintenance of shaft and hoisting equipment. The mine operator must certify that the required inspections, tests, and maintenance have been made then record any unsafe condition identified during the examination or test.

The precise format in which the record is kept is left to the discretion of the mine operator. All records are made by the person conducting the required examination or test. Unless otherwise noted below, these records are to be retained for one year at the mine site.

### (I) Daily and Biweekly Examinations at All Mines

When a personnel hoist is in use, certain critical components of the system, such as the wire rope and its method of attachment to the conveyance, must be examined upon installation and then bi-weekly to ensure that they remain in safe operating condition. The wire rope is examined every fourteen days unless the examination reveals weakening portions of the rope. These weakened portions must then be monitored daily for further deterioration until retirement criteria require that the rope be removed from service. Further, the person conducting the inspections, tests, or maintenance on the hoist or shaft equipment shall certify that those activities have been done. If no unsafe conditions are found, the person conducting these activities need only certify that the activity has been done. However, any unsafe conditions must be noted in a record and dated. These records ensure that any unsafe conditions are promptly repaired or corrected.

### (II) Initial and Semiannual Wire Rope Measurements at All Mines

Newly installed wire rope must be measured at least once in every third interval of the rope's active length to establish a base line for subsequent semiannual measurements of wear and eventual removal of the rope. Diameter measurements are essential indicators of reduction of rope strength due to normal wear. These records are kept until the rope is removed from service.

### (III) Safety Catches at Underground Coal Mines

Safety catches are the last means to safely stop a falling conveyance in the event of rope or equipment failure. It is essential that safety catches remain in working condition, as ascertained by bimonthly testing.

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.

The information is used by industry management and maintenance personnel to project the expected safe service performance of equipment; to indicate when maintenance and specific tests need to be performed; and to ensure that wire rope or other critical components are replaced in time to maintain the necessary safety for miners.

Federal inspectors use the records to ensure that unsafe conditions are identified early and corrected. The consequence of hoist or shaft equipment malfunctions or wire rope failures can result in serious injuries and fatalities. It is essential the MSHA inspectors be able to verify that mine operators are properly inspecting and maintaining their hoist and shaft equipment for unsafe conditions.

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.

No improved information technology has been identified that would reduce the burden; however mine operators may retain the records in whatever method they chose, which may include utilizing computer technology.

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.

Not all states have recordkeeping requirements for hoisting or shaft equipment and in some instances states have adopted the Federal requirement. For states that require the same records as the Federal regulations, one record could be used to fulfill both state and Federal requirements, avoiding duplication.

The records are made and kept on the results of specific examinations and tests of hoisting or shaft equipment required by specific Federal requirements. There are no similar records that could be used or modified for use instead of the required records. Where possible, MSHA has replaced existing recordkeeping with certification requirements. However, the Agency still requires a record to be kept of either inspections or unsafe conditions found during testing, inspection, or maintenance activities to safeguard the safety of miners using the hoisting or shaft system.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

The provisions of the Mine Act and MSHA regulations and standards apply to all operations because accidents, injuries, and illnesses can occur at any mine regardless of size. Congress intended that the law be enforced at all mining operations within its jurisdiction regardless of size and that information collection and recordkeeping requirements be consistent with efficient and effective enforcement of the Mine Act. However, Congress recognized that small operations may face problems in complying with some Mine Act provisions. Section 103(e) of the Mine Act directs the Secretary of Labor not to impose an unreasonable burden on small businesses when obtaining any information under the Act. Accordingly, MSHA takes this into consideration when developing regulatory requirements, and different requirements for small and large mines exist when appropriate and consistent with ensuring the health and safety of miners. These recordkeeping requirements involve small mines, although the requirements are the minimum necessary to ensure the safety of miners. The types of accidents and injuries associated with the use of personnel hoists do not differ with the size of the mine. However, the certification provisions for examinations that do not reveal unsafe conditions should diminish the paperwork burden on all mines.

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.

MSHA has determined that the recordkeeping requirements for hoisting equipment are the minimum necessary to ensure safety. Further reduction of these requirements could allow unsafe equipment to remain in operation, jeopardizing the safety of miners.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- 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;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- 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
- 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.

Although regulations require that tests and examinations be conducted and records of such tests made more frequently than quarterly, the respondent is not required to submit the results to MSHA; rather a record of the results is to be maintained on site to be reviewed during routine inspections.

8. If applicable, provide a copy and identify the data and page number of publication in the Federal Register of the agency's notice, required by 5 CFR Section 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. 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 (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

MSHA will publish the proposed information collection requirements in the Federal Register, notifying the public that these information collection requirements are being reviewed in accordance with the Paperwork Reduction Act of 1995, and giving interested persons 60 days to submit comments.

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

MSHA has decided not to provide payments or gifts to respondents.

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

There is no assurance of confidentiality provided to respondents.

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.

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
- If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.
- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.

The following estimates are based on a total of 260 operations with personnel hoisting (86 FOR METAL AND 174 FOR COAL) in the mining industry. Salaries are based on data from the U.S. Metal & Industrial Mineral Mine Salaries, Wages, & Benefits Survey results.

**(I) Daily and Biweekly Examinations at METAL AND NONMETAL MINES**

Title 30 CFR Sections 56.19023(a), 56.19023(d), 56.19121, 56.19129, 56.19131, 56.19132, 56.19133, 56.19134, 57.19023(a), 57.19023(d), 57.19121, 57.19129, 57.19131, 57.19132, 56.19133, and 57.19134 concern recordkeeping when examinations, inspections, and tests are conducted or when unsafe conditions are found during routine examinations, inspections, and tests of personnel hoisting or shaft equipment. Sections 56.19133 and 57.19133 require weekly shaft inspections. MSHA estimates that it will take an average of 5 minutes (0.08 hours) to record the daily examination, and a total of 20 minutes (.33 hours) to perform the daily examinations. MSHA also estimates that it will take an average of 10 minutes (.1667 hours) to perform the weekly examination and 5 minutes (.08 hours) to record the results. It is estimated that it will take 45 minutes (.75 hours) to perform the bi-weekly examinations and 5 minutes (.08 hours) to record the results.

**Examination Hours:**

86 operations x 260 daily exams x .33 hours	=	7,379 hours
86 operations x 52 weekly exams x .1667 hours	=	745 hours
86 operations x 26 bi-weekly exams x .75 hours	=	<u>1,677 hours</u>
<b>Metal Examination Hours:</b>		<b>9,801 hours</b>

**Recordkeeping Hours:**

86 operations x 260 daily exams x .08 hours	=	1,789 hours
86 operations x 52 weekly exams x .08 hours	=	358 hours
86 operations x 26 bi-weekly exams x .08 hours	=	<u>179 hours</u>
<b>Total Recordkeeping Hours:</b>		<b>2,326 hours</b>

**Total Metal/Nonmetal Hours: 12,127 hours**

**Costs:**

Examinations:	9,801 hours x \$46.09	=	\$451,728.09
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Recordkeeping:	2,326 hours x \$18.29	=	\$ 42,542.54
	Total Metal/Nonmetal Costs:	=	\$494,270.63

**(II) Initial and Semiannual Wire Rope Measurements or Non-Destructive Testing of Wire Ropes at METAL AND NONMETAL MINES**

Title 30 CFR Sections 56.19022, 56.19023(c), 56.19023(e), 57.19022, 57.19023(c), 57.19023(e), concern measurements of wire rope for wear so the rope can be removed from service in a timely manner before the safety of miners is affected. The wire rope at each hoist is replaced on an average of once every five years. Each of the 18 new wire ropes installed per year require initial diameter measurements. These initial measurements are made once for each rope. The measurements take 9 minutes (0.15 hour) to record. Tests and measurements to evaluate each wire rope's wear are made twice a year at all 86 hoisting operations and take 1 hour. In summary, all wire ropes, whether newly installed or already in service, are measured or tested twice a year and notation of measurements or test results take about 9 minutes (0.15 hour) per response.

Examination:			
	86 operations x 2 exams/year x 1 hour	=	172 hours

Recordkeeping:			
	86 operations x 2 exams/year x .15 hours	=	26 hours
	Total Metal/Nonmetal Hours:	=	198 hours

Costs:			
	Examinations: 172 hrs x \$46.09	=	\$ 7,927
	Recordkeeping: 26 hrs x \$18.29	=	\$ 475
	Total Metal/Nonmetal Costs:	=	\$ 8,403

Grand Total Examination Hours (METAL):			
	Daily, Weekly and Biweekly Examinations at All Mines:	=	9,801 hrs

	Initial and Semiannual Wire Rope Measurements at All Mines:	=	172 hrs
	Total Metal/Nonmetal Hours:	=	9,973 hrs

	<b>GRAND TOTAL METAL/NONMETAL COSTS:</b>	<b>=</b>	<b>\$502,673*</b>
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**(I) Daily and Biweekly Examinations at COAL MINES**

Title 30 CFR Sections 75.1404 (Underground mines daily examinations and record), 75.1433 (Underground Mines bi-weekly visual examination), 77.1404 (Surface mine daily examination and record), and 77.1433 (Surface mine bi-weekly visual examination examinations) concern recordkeeping of the completion of required examinations and tests of personnel hoisting equipment and the recording of unsafe conditions are when found during routine examinations. MSHA records show that on the average each respondent (surface facility or underground coal mine) will have 3 personnel hoists (1 slope hoist with a single wire rope, 1 vertical shaft man and materials hoist with a single load bearing rope and a tail/counter weight rope and one elevator with six load bearing wire ropes) or 9 wire ropes per respondent. However, 30 CFR 75.1430 and 77.1430 excludes wire ropes on elevators from biweekly visual examinations. MSHA estimates that it will take a total of 20 minutes (.33 hours) to perform the daily examinations and an average of 5 minutes (0.08 hours) to record the daily examination. MSHA also estimates that it will take an average of 20 minutes (.33 hours) to perform the bi-weekly visual

examination of personnel hoisting wire ropes and an average of 5 minutes (.08 hours) to record the results.

Examinations Hours:

174 operations x 260 daily exams x .33 hours x 3 hoists	=	44,788 hours
174 operations x 26 bi-weekly exams x .33 hours x 2	=	<u>2,986 hours</u>
Total Coal Examinations	=	47,774 Hours

Recordkeeping for examinations Hours:

174 operations x 260 daily exams x .08 hours	=	3,619 hours
174 operations x 26 bi-weekly exams x .08 hours	=	<u>362 hours</u>
Total Coal Recordkeeping Hours:	=	3,981 hours

(II) Initial and Semiannual Wire Rope Measurement or Non-Destructive Testing for Personnel Hoist Ropes at Surface and Underground Coal Mines

Title 30 CFR Sections 75.1432 (Underground mines initial wire rope measurements and record), 75.1433 (Underground Mines twice annual non-destructive testing and record or caliper measurements), 77.1432 (Surface mine initial wire rope measurements and record) and, 77.1433 (Surface mine twice annual non-destructive testing and record or caliper measurements) require mine operators to measure the diameter of recently installed wire ropes used in personnel hoisting at prescribed intervals and to either conduct non-destructive tests or re-measure the wire ropes at the same locations using a caliper device to monitor rope wear toward determining when the rope must be retired / replaced.

MSHA estimated that the initial measurements of each new wire rope requires approximately 4 hours to take and record the caliper measurements and that approximately 33.3% of the ropes in-service are replaced each year. The rope attachments equipment and the visible condition (wear, broken wires or corrosion) is also examined during the subsequent caliper measurement process. Initial wire rope measurement require greater expenditures of time because a new rope must hang under load and stretch for varying periods of time dependent upon diameter and the length of rope. Consequently, several iterations of preparing to caliper the rope diameter may be required before reliable and representative measurements may be taken and recorded to serve as the baseline for measuring rope wear and distortion.

MSHA also estimated that each non-destructive test of a wire rope or caliper measurement of a rope will take approximately 1 hour. MSHA records show that on the average each respondent (surface facility or underground coal mine) will have 3 personnel hoists (1 slope hoist with a single wire rope, 1 vertical shaft man and materials hoist with a single load bearing rope and a tail/counter weight rope and one elevator with six load bearing wire ropes) or 9 wire ropes per respondent. However, 30 CFR 75.1430 and 77.1430 excludes wire ropes on elevators from the requirement of initial measurements and twice annual non-destructive testing so that only 3 ropes per respondent are required to have initial measurements and non-destructive testing or caliper measurements.

30 CFR 75.1433 and 77.1433 allow mine operator the option of using caliper measurement at the same locations as the initial measurement in lieu of non-destructive tests. MSHA estimates 60% of all ropes are caliper measured for compliance and the remaining 40% are non-destructively tested by contractors for the mine operator. An estimate of employing contractors is provided in item 13.

Initial and Semiannual Wire Rope Measurements / Examinations:

174 operations x 3 wire rope initial measurements  
x 33.3% x 4 hours = 695 hours

174 operations x 3 wire ropes caliper measurements  
in lieu of non-destructive tests x 2 per year  
x 1 hour x 60% = 626 hours

Total Examination and Measurement Hours = **1,321 hrs.**

Recordkeeping for Wire Rope Measurements:

174 operations x 3 wire ropes initial measurements  
recording x 40% x .08 hours = 17 hours

174 operations x 3 wire ropes x twice annual  
calipering in lieu of non-destructive testing  
measurements recording x 60% x .08 hours = 50 hours

Total Recordkeeping (filing or data entry) = **67 hours**

(III) Tests of Safety Catches at Underground Coal Mines

Title 30 CFR Sections 75.1400(c) and 75.1400-2( Underground mines bi-monthly test and record for safety catch devices), require that the safety catches on vertically hoisted personnel cages and the brake-cars on slope hoisted man-trips be tested every two months.

MSHA estimated that it will take 45 minutes (.75 hours) to perform the bi-monthly safety catch tests and 5 minutes (.08 hours) to record the results.

Examination and Testing of Safety Catch systems:

174 operations x 6 bi-monthly tests of safety catches  
x 2 (1 man cage and 1 brake-car) x .75 hours = 1,566 hours

Recordkeeping for Safety Catch Systems

174 operations x 6 bi-monthly safety catch  
tests x 2 (1 man cage and 1 brake-car)  
x .08 hours = 167 hours

Total Coal Operator Burden Hours: = 1,733 hours

MSHA estimates that all hoist and wire rope examinations, tests and records are conducted or prepared by senior maintenance personnel and estimates the cost per hour for such individual to be \$54.53 (U.S. Coal Mine Salaries, Wages and Benefits - 2000 Survey Results, Western Mine Eng, Inc.).

Total Direct Operator Burden Cost:

71,098 hours x \$54.53/hr. = \$3,876,974.

**GRAND TOTAL BURDEN HOURS:**

Coal	= 123,713 Hours
Metal	= <u>12,325 Hours</u>
	= 136,038 Hours

**GRAND TOTAL BURDEN HOUR COSTS:**

Coal	= \$ 6,498,712
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Metal = \$ 502,673  
\$ 7,001,385

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

Tests and examination of personnel hoisting equipment are required to be conducted more frequently than quarterly as mandated for the safety of the miners. Because the records are maintained by the mine operator, and not submitted to MSHA there are no additional costs associated with this burden other than those described above. Where the operator elects to use non-destructive wire rope testing for compliance with MSHA standards additional costs are incurred.

MSHA estimates that 40% of the wire ropes in service at Coal Mine Operations comply with 30 CFR 75.1433 and 77.1433 through non-destructive testing provided by contractors. The estimated average cost to the operator is \$500, per wire rope. The interpretation of the electronically generated strip chart(s), the charts and recommendations on continued service are the records that are sent to the mine operator.

40% x 174 operations x 3 wire ropes non-destructive tests x 2 per year x \$500/rope test = \$208,800.

14. Provide estimates of annualized cost to the Federal government. Also, 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. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Records are examined by Federal mine inspectors in the course of routine mine inspections. Therefore, the requirements result in no additional costs to the Federal government. However, MSHA's Technical Support Branch maintains trained personnel and non-destructive wire rope testing equipment which is utilized in support of enforcement personnel and enforcement actions. That organization does in excess of 100 wire rope tests and files investigation reports to both Metal and Non-Metal and Coal District Offices. These activities require an estimated 7,200 man-hours of MSHA GS-12/5 engineers and maintenance of multiple sets of electronic equipment each costing in excess of \$50,000. The average salary for a Engineer or Mine Safety Specialist is GS-12-5, at \$54,651 (2001 Base General Schedule) per annum or \$26.27 per hour.

MSHA estimates those costs to be:

7200 man-hrs. X \$26.27	= \$189,144
Replacement equipment and maintenance	= \$ 55,000

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

The INCREASE in burden hours of 103,632 (from 34,460 to 136,038 is due to the inclusion of inspection and examination certification as a recording burden and recalculation of burden hours associated with non-destructive testing or caliper measurements of wire ropes to monitor wear; recalculation of wages; and the testing, examining, and recording mandated hoist inspections.

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.

MSHA does not intend to publish the results of this information collection.

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.

There are no forms associated with this information collection; therefore, MSHA is not seeking approval to not display the expiration date for OMB approval of this information collection.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submission," of OMB 83-I.

There are no exceptions to the certification statement.

## **B. COLLECTION OF INFORMATION EMPLOYMENT STATISTICAL METHODS**

Collections of information does not employ statistical methods.

