



disclosures, above, would be more than adequate to cover any burden imposed by this recordkeeping requirement.

To summarize, staff estimates that the Rule imposes a total of 116,790 burden hours, as follows: 150 recordkeeping and 3,390 testing and disclosure hours for manufacturers; 135 recordkeeping and 52,282 disclosure hours for installers; 10,833 disclosure hours for new home sellers; and 50,000 disclosure hours for retailers. Rounded to the nearest thousand, the total burden is 117,000 burden hours.

Estimated annual cost burden:

\$2,650,000, rounded to the nearest thousand (solely related to labor costs)

The total annual labor cost for the Rule's information collection requirements is \$2,649,720, derived as follows: \$690 for testing, based on 30 hours for manufacturers (30 hours x \$23 per hour for skilled technical personnel); \$3,705 for manufacturers' and installers' compliance with the Rule's recordkeeping requirements, based on 285 hours (285 hours x \$13 per hour for clerical personnel); \$43,680 for manufacturers' compliance with third-party disclosure requirements, based on 3,360 hours (3,360 hours x \$13 per hour for clerical personnel); and \$2,601,645 for disclosure compliance by installers, new home sellers, and retailers (113,115 hours x \$23 per hour for sales persons).

There are no significant current capital or other non-labor costs associated with this Rule. Because the Rule has been in effect since 1980, members of the industry are familiar with its requirements and already have in place the equipment for conducting tests and storing records. New products are introduced infrequently. Because the required disclosures are placed on packaging or on the product itself, the Rule's additional disclosure requirements do not cause industry

members to incur any significant additional non-labor associated costs.

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