

Some of the companies in the Census Bureau's figures are gas distribution companies that have transmission lines that serve their gas distribution business. Many of these transmission lines that serve gas distribution companies may be in HCA's. Other limited mileage transmission lines serve the fuel needs of one industrial plant. Many of these industrial transmission lines may be in rural areas and outside the scope of this proposed rule.

RSPA/OPS has never received comments from small gas transmission operators concerning the burdens of its regulations. While RSPA/OPS believes that the costs of this proposal will be proportionate to the amount of mileage the pipeline company operates RSPA/OPS, seeks public input on any potential undue impact that this proposal would have on any small entities.

INGAA estimates that its members account for 80% of the gas pipeline transmission mileage in the United States. INGAA has only 24 members however, 3 of these members are not U.S. gas transmission operators. Therefore, approximately 21 companies account for 80% of the U.S. gas transmission pipeline mileage. The remainder of the pipeline companies in this industry share only 20% of the total pipeline mileage.

Because the remaining companies have relatively small mileage compared to the top 20, many may fall entirely outside of HCA's, and will therefore not be impacted by this proposed rule. However, if they are impacted by this proposal, their costs of compliance will be significantly lower than those with thousands of miles of pipeline as the costs of inspection and planning should be considerably lower. Nevertheless, RSPA/OPS stands ready to provide special help to any small operators to assist them in complying with this proposed rule. Based on the above discussion I certify that this proposed rule will not have a significant impact on a substantial number of small entities.

Paperwork Reduction Act

This proposed rule contains information collection requirements. As required by the Paperwork Reduction Act of 1995 (44 U.S.C. 3507(d)), the Department of Transportation has submitted a copy of the Paperwork Reduction Act analysis to the Office of Management and Budget for its review. The name of the information collection is "Pipeline Integrity Management in High Consequence Areas Gas Transmission Pipeline Operators." The purpose of this information collection is

designed to require operators of gas transmission pipelines to develop a program to provide direct integrity testing and evaluation of gas transmission pipelines in high consequence areas.

The following is a summary of the highlights of the paperwork reduction act analysis. The complete analysis can be found in the public docket.

There are 668 gas transmission operators that could potentially be subject to this proposed rule. It is estimated that 296 of these gas transmission operators have 40 or more miles of pipeline. The remaining 372 operators have less than 40 miles of pipeline. It is estimated that the operators with more than 40 miles of pipeline will have considerably more time and expense to develop integrity management programs. However, before operators can develop integrity management programs they must determine how much of their pipeline is located in high consequence areas (HCA's). It is estimated that it will take the operators with 40 or more miles of pipeline 1,000 hours to estimate the amount of pipeline impacted. Operators with less than 40 miles of pipeline will take only 250 hours.

It is estimated that operators with 40 or more miles of pipeline will need 3,968 hours to develop an integrity management plan framework. For operators with less than 40 miles of pipeline it is estimated this task will take 2,400 hours. However, it is estimated that 25% of the companies with more 40 miles or more of pipeline already have integrity management program frameworks.

Additionally, all the operators will be required to integrate the new data they collect into their current management systems. The time to integrate the data the first year will be 2,040 hours for the companies with 40 or more miles of pipeline and 510 hours for companies with less than 40 miles of pipeline. It is estimated that 25% of all operators with 40 or more miles of pipeline already have a system for integrate their data.

It will take operators initially, approximately 16 hours of a computer programmer's time to provide OPS and state pipeline safety offices "real time" access to their performance measures via the operator's web site or a dial-up modem.

The integrity management plans need to be modified on a yearly basis. RSPA/OPS estimates that it will take all operators regardless of size 313 hours per year to update their plans annually. RSPA/OPS further estimates it will take an additional 160 hours per operator to perform the necessary record keeping

annually. Finally RSPA/OPS estimates it will take operators with 40 or more miles of pipeline 1020 hours to annually integrate the necessary data. It will take operators with less than 40 miles of pipeline approximately 255 hours to annually integrate the necessary data.

Comments concerning this information collection should include the docket number of this proposal. They should be sent to Docket Facility, U.S. Department of Transportation, Plaza 401, 400 Seventh Street, SW, Washington, DC 20590-0001. Comments are specifically requested concerning:

Whether the collection is necessary for the proper performance of the functions of the Department, including whether the information would have a practical use;

The accuracy of the Department's estimate of the burden of collection of information including the validity of assumptions used;

The quality, usefulness and clarity of the information to be collected; and minimizing the burden of collection of information on those who are to respond, including through the use of appropriate automated electronic, mechanical, or other technological collection techniques or other forms of information technology *e.g.*, permitting electronic submission of responses.

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless a valid OMB control number is displayed. The valid OMB control number for this information collection will be published in the **Federal Register** after it is approved by the OMB. For details see, the complete Paperwork Reduction analysis available for copying and review in the public docket.

Executive Order 13084

This proposed rule has been analyzed in accordance with the principles and criteria contained in Executive Order 13084 ("Consultation and Coordination with Indian Tribal Governments"). Because this proposed rule does not significantly or uniquely affect the communities of the Indian tribal governments and does not impose substantial direct compliance costs, the funding and consultation requirements of Executive Order 13084 do not apply.

Executive Order 13132

This proposed rule has been analyzed in accordance with the principles and criteria contained in Executive Order 13132 ("Federalism"). This proposed rule does not propose any regulation that: