

**From:** [Mike Murray](#)  
**To:** [Doug Wetmore](#)  
**Cc:** [Philip Selleck](#); [Sandra Hamilton](#); [Paul Stevens](#)  
**Subject:** draft Paperwork Reduction Act language for proposed rule  
**Date:** 05/20/2010 03:11 PM

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Doug,

The park was assigned with drafting language for the proposed rule regarding the amount of time it would take to obtain an ORV permit. We had previously provided information on how long it would take to fill out the permit application form, but we needed to add the time it would take to review the regs and take the basic knowledge test.

To estimate the amount of time it may take an average individual to review the proposed ORV regs and complete a "basic knowledge test" in order to obtain an ORV permit, we created a mock-up ORV brochure (text only; no graphics) and a related 15 question test. Note: The "brochure" and test were very rough first drafts, but served the purpose of helping us estimate the time required. Based on that exercise, attached is draft language to include in the Paperwork Reduction Act section of the proposed rule (approx. page 30 in the 4/23/10 version). Time estimates: 11 minutes to complete the application form + 12 minutes to review regs and take test. We rounded 23 up to 30 minutes total; however, could probably make a good case that 25 minutes is closer to the actual time required, if that makes any difference. Lastly, for discussion on June 10-11 but to help keep the draft below in perspective, at this point we are inclined to drop the test requirement from the final "selected alternative" and go with a simpler approach of filling out the application form, reading the regs (or watching a short video equivalent) and signing for the permit to acknowledge acceptance of responsibility for complying with the regs. Can discuss that further on June 10-11.

The draft language based on alternative F in the DEIS is as follows (third bullet or the attached file):

Paperwork Reduction Act

The existing OMB Control Number...

How to submit comments to OMB...

**In order to obtain a special use permit authorizing the activity regulated under this rule, the rule will require an individual to fill out an application form, review information related to the requirements contained in this rule, and take a 10-15 question basic knowledge test to demonstrate an understanding of the requirements. Completion of the application, review of the information and completion of the basic knowledge test will be required. It is expected that the average individual can complete the process in thirty (30) minutes or less.**

[attachment "Paperwork Reduction Act text.draft 052010.docx" deleted by Doug Wetmore/DENVER/NPS]

Thanks,

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----- Forwarded by Mike Murray/CAHA/NPS on 05/20/2010 04:34 PM -----

**Paul  
Stevens/CAHA/NPS** To Mike Murray/CAHA/NPS@NPS  
cc  
05/20/2010 04:12 PM Subject Test Results

The following folks were tested on the information you provided:

Collette Johnson: Missed 4; 11:50 minutes.  
Kelly Rodriguez: Missed 2; 11:00 minutes.  
John Kimmel: Missed 3; 12:00 minutes.

Average time to read information and take and complete test: 11:50.

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