

From: Don Williamson [mailto:dewilliamson42@bellsouth.net]
Sent: Saturday, January 27, 2018 5:46 PM
To: PRAcomments <PRAcomments@doc.gov>
Subject: Comment for Document number 2018-01511

Attn: Jennifer Jessup

The burden rate published in the aforementioned document number (above) appears to be lower than a quick calculation of 15 minutes times the 22150 surveys times 4 . The calculated number should be 22,150, not the 19,087. I also refute that the published cost to survey takers is 0\$ even though you mention you do not account for the time needed to complete the survey. On average, any corporation will need to enlist two to 3 individuals within their financial sector to dig up the info, prepare a draft, seek approval from management before it can be sent. This process can realistically consume 4 hours of real time labor not being put to good use in the business itself.

I also noted that this quarterly survey is a sub sample of a larger EOY survey OMB# 0607-0422. If this is true, than the data collected within the larger survey should be used instead of the 4th quarter survey. This action reduces the quarterly burden of hours from 22150 to 16613 hours.

I am in favor of reducing these surveys from a quarterly cycle to once every 4 months or even better, bi-annually. The data extracted and used by other agencies can simply be interpolated to reach their objective while reducing the operating costs of our government at the same time.

I am fully in favor for exploring auto extraction methods from other agencies' surveys that are going on constantly as the final means of supplying the needed data and removing this form altogether.

Regards,

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