

July 17, 2020

Ms. Pamela Bennett
Rural Development Innovation Center
Regulations Management Division
U.S. Department of Agriculture
1400 Independence Avenue SW
STOP 0793, Room 4015 South Building
Washington, DC 20250-0793

RE: *Federal Register* notice of July 2, 2020, for the Annual Survey of Farmer Cooperatives
(OMB Number: 0570-0007)

Dear Ms. Bennett:

The Bureau of Economic Analysis (BEA) strongly supports the continued collection of data by the Rural Business-Cooperative Service on the Annual Survey of Farmer Cooperatives forms. The data collected are crucial to key components of BEA's economic statistics.

BEA uses data from these forms to prepare the national income and product accounts. More specifically, the data for net income before taxes is used to prepare annual estimates of patronage dividends of farmer cooperatives, a component of nonfarm proprietor's income. Farmer cooperatives' net income is also used to extrapolate the benchmark estimate for patronage dividends of farmer cooperatives that is taken from the *Farmer Cooperative Statistics* publication.

Please keep BEA informed about any modifications to these forms. We are particularly interested in any modifications proposed during the forms' approval process that would substantially affect our use of these data. For additional information, please contact Tiffany Burrell, Source Data Coordinator, at 301-278-9618 or by email at tiffany.burrell@bea.gov. Should you need assistance in justifying these forms to the Office of Management and Budget, please do not hesitate to contact BEA.

Sincerely,

Dennis Fixler
Chief Economist