August 11, 2020

Thomas Smith
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233

RE: *Federal Register* notice of July 6, 2020, for the Census Bureau's Annual Retail Trade
        Survey (OMB Number: 0607-0013)

Dear Mr. Smith:

The Bureau of Economic Analysis (BEA) strongly supports the continued collection of data by
the U.S. Census Bureau on the Annual Retail Trade Survey (ARTS). The data collected on these
forms are crucial to key components of BEA's economic statistics.

BEA strongly supports the collection of data on these forms and uses information from them in
the national income and product accounts (NIPA), the annual and benchmark input-output (I-O)
accounts, and the GDP by industry statistics. The ARTS is the only source of data for retail trade
sales, purchases, inventories, sales taxes, and gross margins for output in the benchmark and is
critical for the industry benchmark estimates. The attached table shows how data from these
forms are used by BEA.

Additionally, BEA supports the quinquennial collection of the expense data for detailed
operating expenses with the ARTS that were previously collected quinquennially on the Business
Expenses Supplement (BES). A list of items (as previously obtained through the BES) and their
use by BEA are also attached.

Please keep BEA informed about any modifications to this survey. We are particularly
interested in any modifications proposed during the survey's 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 e-mail at Tiffany.Burrell@bea.gov.
Should you need assistance in justifying this survey to the Office of Management and Budget,
please do not hesitate to contact BEA.

Sincerely,

Dennis J. Fixler
Chief Economist

Attachment

ATTACHMENT
BEA's Use of Annual Retail Trade Survey Data

ITEMS USED	BEA USE
Retail sales, sales taxes, gross margins, E-commerce sales by merchandise line	Personal Consumption Expenditures in the NIPAs
Merchandise inventories, inventory valuation methods, merchandise purchases, inventory outside the U.S.	Change in private inventories component in the NIPAs
Retail sales, merchandise inventories, inventory valuation methods, merchandise purchases, sales taxes	Output for the benchmark I-O accounts and the annual industry accounts.

Quinquennial Collection (formerly from Business Expenses Supplement)
Annual Retail Trade Survey

ITEMS USED	BEA USE
Annual Payroll before deductions	Intermediate Inputs
Employers cost for fringe benefits	Intermediate Inputs
Contract temporary staff and leased employee expense	Intermediate Inputs
Expensed equipment	Intermediate Inputs
Purchase of packaging materials and containers	Intermediate Inputs
Purchases of other materials, parts, and supplies (not for resale)	Intermediate Inputs
Commission expenses	Intermediate Inputs
Expensed purchases of software	Intermediate Inputs
Data processing and other purchased computer services	Intermediate Inputs
Purchased communication services	Intermediate Inputs
Purchased repairs and maintenance to machinery and equipment	Intermediate Inputs
Purchased repairs and maintenance to building structures and offices	Intermediate Inputs
Leased and rental payments for machinery equipment and other tangible items	Intermediate Inputs

Leased and rental payments for land, buildings, structures, store spaces and offices	Intermediate Inputs
Purchased electricity	Decomposition of intermediate inputs in capital (K), labor (L), energy (E), materials (M), and purchased services (S) (KLEMS)
Purchased fuels	KLEMS
Water sewer refuse removal and other utility payments	KLEMS
Purchased transportation shipping and warehousing services	Intermediate Inputs
Purchased advertising and promotional services	Intermediate Inputs
Purchased professional and technical services	Intermediate Inputs
Depreciation and amortization charges	Intermediate Inputs
Government taxes and license fees	Intermediate Inputs
All other operating expenses	Intermediate Inputs
Total Operating Expenses	Intermediate Inputs
Interest Expense	Intermediate Inputs