

September 14, 2020

Ms. Carol Rowan
BLS Clearance Officer
Division of Management Systems
Bureau of Labor Statistics
Room 4080
2 Massachusetts Avenue, NE
Washington, DC 20212

RE: *Federal Register* notice of August 24, 2020, for Forms 3023-NVS, 3023-NVM,
and 3023-NCA, Annual Refiling Survey (OMB Number: 1220-0032)

Dear Ms. Rowan:

The Bureau of Economic Analysis (BEA) strongly supports the updating and continued collection of information in the Bureau of Labor Statistics' (BLS) Annual Refiling Survey (ARS) program. This important survey is critical to the data quality of several key components of BEA's economic statistics.

The importance of accuracy in the estimates resulting from the ARS cannot be overstated. The accuracy of the BLS ES-202 employment and wage data, classified by industry using the ARS, ensures that BEA appropriately captures the industrial and geographic changes in the economy in its regional accounts, national income and product and wealth accounts, input-output accounts, and gross domestic product by industry estimates. In fact, the ARS is the only source of current information on changes in industry classification and location of employers for BEA's State and national personal income estimates. The impact on industrial classification comes to BEA through the use of the ARS by the Census Bureau. BEA's regional income & product account estimates are used to distribute \$500 billion of federal funds to state and local governments.

Please keep BEA informed concerning any modifications to these forms. We are particularly interested in any modifications proposed during the forms' approval process that would substantially impact the use of them in the BLS programs. For additional information, please contact Tiffany Burrell, Source Data Coordinator, on 301-278-9618 or by e-mail 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 J. Fixler
Chief Economist