



November 6, 2020

Ms. Sheleen Dumas
Departmental PRA Clearance Officer
Office of the Chief Information Office
Commerce Department

RE: *Federal Register* notice of September 10, 2020, for the U.S. Census Bureau's Annual Capital Expenditures Survey (OMB Number: 0607-0782)

Dear Ms. Dumas:

The Bureau of Labor Statistics (BLS) currently uses ACES detailed equipment and structure investment data collected in Economic Census years in its 4-digit multifactor statistics produced by the BLS Industry Productivity Studies (IPS) program. IPS uses ACES data to determine the investment patterns of detailed capital assets by 4-digit manufacturing industries. At the major sector and National Income and Product accounts industry level, BLS's Major Sector Productivity (MSP) program uses equipment and structure investment data from the Bureau of Economic Analysis, which is also a key stakeholder of the ACES data. The ACES data are vital to our measures of multifactor productivity.

BLS welcomes the additional content related to the Coronavirus pandemic, as it will help us better understand the impact of the pandemic on firm investment decisions. The proposed efforts geared toward coordinating samples, collection, and updates across Census surveys will be beneficial to BLS productivity data. BLS combines data from the ACES and the Annual Survey of Manufacturers to produce multifactor productivity measures, so it is critical for us to continue to be able to discern in which NAICS industry particular asset investments are made for large firms whose overall enterprise-wide establishments may span multiple NAICS codes. Because we produce statistics to measure productivity for detailed NAICS industries, any changes to achieve a more holistic view of the respondents' overall operations should be designed to enable disaggregation into the NAICS industries of included worksites, if possible.

Finally, BLS is excited about the improvements to questions about expenditures on robotics, as it will help fill an important data gap in its measures of capital services. As technology is evolving, we are constantly receiving inquiries concerning the effects of automation on U.S. productivity. The robotics questions will allow us to provide answers to our customers. These data will improve our measures of capital services, allow us to assess the effects of R&D, and provide valuable information on sources of economic growth and productivity.

Sincerely,
Lucy P. Eldridge

Lucy P. Eldridge, Ph.D.
Associate Commissioner for Productivity and Technology
U.S. Bureau of Labor Statistics