



DEPARTMENT OF SLEEP DISORDERS MEDICINE
Sleep Disorders & Research Center

2799 West Grand Blvd., CFP-3
Detroit, MI 48202-2689
(313) 916-4417 Office

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

Dear Ms. Rowan,

I am delighted that the BLS is open to receiving comments regarding the next wave of the American Time Use Survey data collection in 2010. I am a federally funded sleep researcher at Henry Ford Hospital in Detroit Michigan where I study the effects of shift work on health. I have consistently been impressed with the knowledge gained from the BLS from a scientific and public health perspective.

I am excited by the fact that the Secretary of Labor has delegated to the BLS the authority to collect, compile, and analyze statistical data on work related injuries and illnesses. This encouraging news prompted me to provide some constructive comments regarding the items used to assess "fatigue".

My area of scientific study is sleep and wakefulness, specifically in relation to work schedules and work hours. Therefore my comments will be limited to my area of expertise, the assessment of fatigue and risk for accidents. In evaluating the validity of the methodology and assumptions used and in order to enhance the quality, utility, and clarity of the information to be collected, I have one important suggestion. Specifically, I would strongly discourage use of the term "tired" in the assessment of fatigue. The non-specific nature of this term severely detracts from its utility. I would suggest using a term that has been more formally linked to excessive/pathological fatigue such as drowsy or sleepy. These terms more specifically convey to the respondent the construct as it relates to sleep as opposed to general fatigue covering broad concepts such as depression, muscle or mental fatigue, and that fatigue associated with chronic fatigue syndrome.

Much can be learned from this next wave of the BLS ATUS survey and improved specificity of the terms used in data collection will serve to enhance the scientific integrity of the project overall and increase the positive impact of this project for the future health and well being of the general public.

Sincerely,

A handwritten signature in black ink, appearing to read "CLD", with a long, sweeping horizontal line extending to the right.

Christopher L. Drake, PhD
Senior Bioscientific Staff
Henry Ford Hospital
Sleep Disorders and Research Center
Detroit, MI 48202