

Author Full Name : Andrew Reamer**Received Date :** 08/25/2022 06:25 PM**Comments Received :**

The capacity of BIS to conduct technology assessments of the U.S. industrial base is hindered by the fact that the Commerce Department and the Labor Department are each forced to maintain industry data series that by law they are not allowed to reconcile. For instance, as can be seen in the attached problem statement, the Commerce Dept says there are 264,000 workers in chip manufacturing and the Labor Department says there are 374,000. The "apples" and "oranges" nature of the discrepancy is, unfortunately, not addressed in the recent BIS study of the ICT supply chain as ordered by President Biden, as BIS uses Commerce and Labor data without distinguishing their differences. See Section 6.1 of https://www.bis.doc.gov/index.php/component/docman/?task=doc_download&gid=2939 The Treasury Department has proposed a legislative fix (attached). In the meantime, however, I encourage OMB to ask BIS to indicate how it intends to conduct industrial base assessments while taking into account the inconsistency of Commerce and Labor data by industry.