OMB CONTROL NO. 1220-0198

I am writing in response to the public comment period for the QCEW Response Survey (QBS). I heartily support the BLS initiative to add supplementary questions to the Annual Refiling Survey (ARS).

Comments were invited on the following issues and my responses are shown below each question.

(1)   Whether the collection of information is necessary for the proper performance of the functions of the Department, including whether the information will have practical utility.

I believe that the answers to the QBS questions are intimately related to the role and functions of the BLS and to the Department of Labor. The QBS will allow BLS and DOL to be better informed on the labor market and thus make better informed policy decisions.

(2)   if the information will be processed and used in a timely manner;

The prior QBS and BRS responses have been processed in a timely manner. I also believe that while the previous BRS was treated as more of a special operation, this 3-year clearance clears the way for BLS to be even more timely with well-planned and staffed operations and analysis and publication.

(3)   the accuracy of the agency's estimates of the burden and cost of the collection of information, including the validity of the methodology and assumptions used.

BLS has now conducted a small number of QBS and BRS projects. While the fixed costs have been easy to determine, the variable costs can now be relatively easily estimated. Similarly, the usual processes for estimating response burden is the result of decades of pretests and actual projects. These also are easily and carefully measured. Pilot tests, respondent follow up and other mechanisms allow for accurately calculating respondent burden.

(4)   ways to enhance the quality, utility and clarity of the information collection.

Traditional methods to improve usefulness of information include carefully worded and tested questions, clearly defined data items that are known to be easily available to respondents, edits either during data collection of afterward. BLS includes all of these aspects in its work.

Cognitive testing of potential questions improves understanding by respondent. On-line and post collection edit help minimize key entry and other response errors.

This QBS proposal, building on decades of careful research and study of data collection methods and cognitive testing insures that the QBS surveys will be accurate and useful.

(5)   ways to minimize the burden of the collection of information on those who are to respond, including the use of automated collection techniques or other forms of information technology.

The QBS projects listed in this public comment opportunity state that responses will be made to questions offered to respondents via the internet. So, after the normal ARS questions are answered on-line, the respondent can easily and quickly move to answer the QBS supplementary questions. It is also clear based on the proposed questionnaire that the questions ask for commonly available information or knowledge that respondents will be able to access and provide relatively easily.

As is well known, internet collection is one of the most cost-effective data collection methods. The respondent enters the data with a click(s), internal or range edits can quickly provide feedback to the respondent for potentially improving the accuracy of the response and also prevent a range of simple errors.

The QBS is similar in concept to the supplements to the Current Population Survey (CPS). Key features of the CPS — monthly probability-based panels allow that a few questions may be easily asked at the end of a respondent's time in sample. In this way, the basic integrity of the CPS is not threatened.   The CPS supplements have stable sets of questions repeated periodically, and novel question sets that bring new information to the public.

I suggest to BLS that similar supplemental questions could be added to the Job Openings and Labor Turnover Survey (JOLTS) program as well. JOLTS has these characteristics of the CPS. The monthly sample rotation of probability-based panels also lends the basic structure