

November 10, 2008

David H. Galler  
Office of the Chief  
Direct Investment Division  
Bureau of Economic Analysis  
U.S. Department of Commerce  
BE -50  
Washington D.C. 20230

**Re: RIN 0691-AA65: Bureau of Economic Analysis**

Dear Mr. Galler:

The Annual Survey of Foreign Direct Investment in the United States (BE-15) produced by the U.S. Bureau of Economic Analysis provides benchmark data for states on the type, number, investment, and employment by country of foreign enterprises within state borders. This record is the definitive data used by state governments to measure the globalization of their regional economies.

On Thursday, September 11, 2008 the U.S. Department of Commerce posted in the Federal Register its intent modify the Annual Survey of Foreign Direct Investment in the United States by reducing detail and raising reporting thresholds. Specifically the changes will discontinue collection and publishing the following data items:

- Manufacturing employment by state
- Gross property, plant, and equipment by state
- Commercial property by state

The State of Ohio currently operates a network of 14 overseas international trade and investment offices, managed by our Global Markets Division. The division is constantly analyzing data in its efforts to determine the most strategic location for the deployment of taxpayer dollars to fund Ohio offices overseas. One primary component of that data is understanding the significant investment activities by country in facilities in Ohio. The state has benefited tremendously by these investments over the years, and now is home to over 1,000 internationally owned facilities operated by over 700 companies throughout state. Those facilities directly employ over 250,000 Ohioans. Without the data provided by the BEA and its foreign direct investment reports, our ability to effectively monitor these investments will be severely compromised.

Sincerely,

John Magill  
Chief Strategic Officer