



## REGULATORY & HOUSING POLICY AREA

**DAVID A. CROWE**

Senior Staff Vice President

April 7, 2008

Amy A. Hobby  
BLS Clearance Officer  
Division of Management Systems  
Bureau of Labor Statistics, Room 4080  
2 Massachusetts Avenue, NE.  
Washington, DC 20212

Subject: Proposed Information Collection, Comment Request (Current Employment Statistics).

Dear Ms. Hobby:

Pursuant to the notice published in the February 8, 2008 *Federal Register* (73 Fed. Reg. 7608), the National Association of Home Builders (NAHB) would like to take this opportunity to support the information collection proposed by the Bureau of Labor Statistics (BLS) for the Current Employment Statistics (CES) program.

The National Association of Home Builders is a Washington-based trade association representing more than 235,000 members involved in home building, land development, and other industries related to residential construction. Because home building activity is economically linked to employment growth, NAHB and its members have a strong interest in the CES.

The CES program provides key information on payroll employment that is widely used by policymakers at the federal, state, and local levels; as well as by business, labor, and economic forecasters in the private sector. Because these statistics are available on a monthly basis, and appear in a timely fashion only a few days after the end of the month, they are among the data most often cited as an indicator of the overall state of the U.S. economy. For example, the U.S. Congress Joint Economic Committee and the Board of Governors of the Federal Reserve System have both made frequent reference to the level payroll employment produced by the CES when formulating policies to deal with the recent slowdown in GDP growth.

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NAHB regularly makes use of information from the CES, particularly in its forecasts of housing and economic activity. Because this CES information is available in such a timely fashion, NAHB—along with virtually all organizations that produce economic forecasts—use it as key way to keep its finger on the pulse of the U.S. economy. In many respects, information from the CES forms the centerpiece of our economic forecast, and we firmly believe that no good substitute for CES data is available from any other source.

For these reasons, NAHB strongly supports the continuation of the CES program conducted by BLS. If you have any questions about NAHB's comments, please contact Paul Emrath, NAHB's Assistant Staff Vice President of Housing Policy Research (202-266-8449, [pemrath@nahb.com](mailto:pemrath@nahb.com)).

Respectfully,



David A. Crowe  
Senior Staff Vice President  
Regulatory and Housing Policy