

Employment Department

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June 25, 2010

Carol Rowan, BLS Clearance Officer Division of Management Services Bureau of Labor Statistics, Room 4080 2 Massachusetts Avenue, NE Washington, DC 20212

Dear Ms. Rowan:

Thank you for the opportunity to comment on the Bureau of Labor Statistics' Annual Refiling Survey (ARS), as referenced in the Federal Register on May 27, 2010.

We in the State of Oregon have two comments on this Federal Register notice.

- 1. The ARS is of critical importance to the nation's (and each state's) employment statistics and labor market information. The Quarterly Census of Employment and Wages (QCEW), the program of which the ARS is a part, provides not only the most detailed information on the nation's and each state's industry employment, but it also serves as the universe for many other surveys, which provide important information about occupational employment and wages, vacancies, benefits, green jobs, and much more. Successful completion of the ARS is absolutely necessary for the proper performance of the BLS' functions and the information collected through the ARS will be of high value.
- 2. There is an error in the Federal Register notice, in the second paragraph of the Current Action section. The notice states, "Once every four years, the SWAs survey employers ...". This should read, "Once every three years, ...". The ARS was temporarily moved from a three-year to a four-year cycle to make funding available for a rewrite of the QCEW System, but that temporary change ends during the next fiscal year. The normal cycle for the ARS, and the cycle that will return effective October 1, 2011, is three years. We suggest that the Federal Register notice, and all other communications, should reflect this three-year cycle, not the temporary and abnormal four-year one.

If you have questions about our comments, please feel free to contact me at Graham. J. Slater@state.or.us or (503) 947-1212.

Sincerely,

Graham Slater, Administrator Workforce and Economic Research

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