



9to5, National Association of Working Women

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January 17, 2012

Nora Kincaid, BLS Clearance Officer
Division of Management Systems
Bureau of Labor Statistics, Room 4080
2 Massachusetts Avenue, NE
Washington, DC 20212

Re: Comments on the proposed revision of the National Compensation Survey

Dear Ms. Kincaid:

Thank you for the opportunity to comment on the proposed revision of the National Compensation Survey (NCS). These comments are submitted by 9to5, National Association of Working Women. 9to5 is a national membership-based organization of low-wage women working to improve corporate and public policy on workplace issues. We staff a national, toll-free Job Survival Helpline which provides free information, resources, referrals and support to thousands of women and men annually who call regarding job problems and workplace rights. We engage our members and constituents in speaking out about workplace issues that directly affect them and in leading policy change campaigns to improve workplace conditions.

Because of the important role the NCS plays in the development of private and public sector compensation and benefit policies, the content of the survey is critically important. 9to5 suggests the following improvements:

1. Include questions designed to collect sex- and race-specific data on disparities in pay and access to benefits between women and men and between workers of different races and ethnic groups. Collection of such data will help quantify the disparities and avoid the risk of perpetuating them, as well as help frame corporate and public policy proposals and inform employer best practices.
2. Modify questions, analysis and reporting regarding workers' access to paid sick days and paid family leave to account for probationary periods and other tenure requirements that prohibit workers from being able to utilize employer-provided leave. These modifications will generate a more accurate picture of workers' access to paid sick days and paid family leave.

Again, we appreciate this opportunity to comment on the NCS. Feel free to contact me for further information or comment from 9to5.

Sincerely,

Linda A. Meric
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