

June 16, 2014

Mr. David Hancock
NASS Clearance Officer
U.S. Department of Agriculture
Room 5336, South Building
1400 Independence Avenue, SW
Washington, DC 20250-2024

RE: *Federal Register* notice of April 21, 2014, for the National Agriculture Statistics Service's 2014 Tenure, Ownership and Transition of Agricultural Land (TOTAL) survey (OMB Number: 0535-0240)

Dear Mr. Hancock:

The Bureau of Economic Analysis (BEA) strongly supports the reinstatement of data collection for the National Agriculture Statistics Service's (NASS) 2014 Tenure, Ownership and Transition of Agricultural Land (TOTAL) survey; formerly known as the Agricultural Economics and Land Ownership Survey (AELOS). As with its predecessor, the data collected in this survey would be crucial to key components of BEA's economic statistics.

BEA will use direct information collected in the TOTAL survey to improve the national income and product accounts. BEA's estimates of gross domestic income (GDI), personal income (PI), and personal consumption expenditures (PCE) benefit from the data generated by the TOTAL survey. BEA uses the data on patterns of farm ownership to improve the estimates of rental income of persons from farm dwellings (part of GDI and PI), the rental value of farm dwellings (part of PCE), and the portion of output from the housing sector attributed to farms. In the past, BEA relied heavily on the previous AELOS for these estimates, and the quality of these estimates suffered when this survey was discontinued. In addition, the TOTAL survey would also improve other national statistics, including measures of stocks of land on farms and measures of land used for cultivated assets, and would improve measures of industry output and income indirectly.

Furthermore, BEA will indirectly use the information from the TOTAL survey to update the farm sector estimates in the national and regional accounts. Information from this survey will be used by the Economic Research Service (ERS) in preparing estimates of farm income and expenses for the U.S. and states. BEA uses these ERS estimates to prepare its national and state estimates of farm gross product and farm proprietors' income. Although farm income and product are small shares of national income and product, their volatility must be accurately measured to identify the sources of change in the overall economy.

Please keep BEA informed concerning any modifications to this form. We are particularly interested in any modifications proposed during the form's approval process that would substantially affect our use of these data. For additional information, please contact Tiffany Burrell, Source Data Coordinator, on 202-606-9618, or by e-mail at Tiffany.Burrell@bea.gov. Should you need assistance in justifying this form to the Office of Management and Budget, please do not hesitate to contact BEA.

Sincerely,



Dennis J. Fixler
Chief Statistician