

August 7, 2015

Office of Policy Development and Research
Attn: Mr. Daniel Carroll
Employment and Training Administration
U.S. Department of Labor
200 Constitution Avenue NW.
Room N-5641
Washington, DC 20210

RE: *Federal Register* notice of June 26, 2015, for the National Agricultural Workers Survey
(OMB Number: 1205-0453)

Dear Mr. Carroll:

The Bureau of Economic Analysis (BEA) strongly supports the continued collection of data by the U.S. Department of Labor for the National Agricultural Workers Survey. This survey is our main data source for key components of BEA's economic statistics.

Data from the National Agricultural Workers Survey (NAWS) have been used since 1997 by the BEA for estimates in the international transactions accounts and gross domestic income. Specifically, BEA estimates compensation of undocumented immigrant agricultural workers using the following variables: the percentage of farm workers that are migratory; the percentage of these migratory workers who are undocumented immigrants; the average number of weeks worked per year by these migratory workers; and their average hours worked per week. Also, the number of undocumented immigrant workers, who are calculated in this methodology, is important to our estimate of the compensation of undocumented nonagricultural workers.

The compensation of undocumented immigrant workers accounts for over 50 percent of our estimate of compensation of employees in the international transactions accounts. Compensation of employees' payments amounted to \$16.3 billion in 2014. These payments are part of total payments to the rest of the world, an important component in the estimation of gross domestic income.

These data are not obtainable elsewhere and are indispensable to our estimates. Our compensation estimates compose an ongoing time series. The reportedly large increases of undocumented immigrant workers in the United States make the continual updating of our data vitally important. The data used and how they are used by BEA can be found in the attachment.

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,

A handwritten signature in blue ink, appearing to read "Dennis Fixler". The signature is fluid and cursive, with the first name "Dennis" and last name "Fixler" clearly distinguishable.

Dennis J. Fixler
Chief Statistician

Attachment

Attachment

BEA's Use of the National Agricultural Workers Survey

Data Component Used:	Used to Estimate:
Total Number of Farm Workers and Average Number of Hours Per Week	Compensation of Employees Table 1.1, Line 15 Table 4.1, Line 42 Expenditures of Undocumented Workers Table 3.1, Line 14 Travel: Table 1.2, Line 16