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June 28, 2013

David Hancock
Clearance Officer
National Agricultural Statistics Service
United States Department of Agriculture
Room 5336 South Building
1400 Independence Avenue SW
Washington, DC 20250-2024

Subject: Current Agricultural Industrial Reports, Docket # 0535–NEW

Dear Mr. Hancock:

The National Cotton Council (NCC) is pleased to submit comments in support of NASS's request to reinstate eight data collection instruments previously used by the Census Bureau. The NCC is the central organization of the U.S. cotton industry representing producers, ginner, warehousemen, merchants, cooperatives, textile manufacturers, and cottonseed processors and merchandisers in 17 states stretching from California to Virginia.

While each of the eight surveys is important to U.S. agricultural interests, we will address our comments to the importance of resuming the survey 'Consumption on the Cotton System and Stocks.' When coupled with existing reports on cotton production and exports, accurate data on cotton consumed by U.S. mills and the stocks held in the U.S. provide a complete picture of the cotton balance sheet.

According to the latest data from the Bureau of Labor Statistics, approximately 380,000 people were employed in the U.S. textile and apparel industry. Also, consumers in the U.S. spend more than \$300 billion dollars annually on clothing and shoes according to the Bureau of Economic Analysis. The U.S. textile industry is still a very important part of the U.S. manufacturing sector and having the ability to monitor the size of this industry is extremely important both for policy and business planning objectives.

In resuming the consumption survey, NASS proposes a number of changes to the questionnaire in order to reduce the burden of data collection. We agree with the proposal to not request a break-down of consumption of U.S. cotton and foreign cotton by U.S. mills given the limited amount of foreign cotton consumed by the U.S. textile industry. We also understand the proposal to not seek information on the manmade fibers consumed on the cotton system. While those data can be an indicator of cotton's share of the overall fiber market, the primary objective of the survey is to gauge cotton consumption. NASS also proposes to not request upland consumption by staple length. While the detailed data would be useful information, it was the case in the previous Census Bureau reports, that while data by staple length was surveyed, results by staple length were not published due to disclosure issues.

As a final point, the NCC would request that NASS reconsider the proposed change of not surveying spindle numbers and hours of operation. In the past, those data have proven to be useful to the industry in determining the overall capacity of the U.S. cotton consumption system. Since spindle numbers do not typically exhibit dramatic changes on a monthly basis, the NCC suggests that NASS consider surveying the spindle numbers and hours of operation on a semi-annual or annual basis. This would give the industry a snapshot of capacity utilization while minimizing the burden of additional data collection.

The NCC appreciates the opportunity to submit these comments and reiterate our strong support of NASS's efforts to resume the surveys. If the U.S. cotton industry can be of further assistance to your efforts, please do not hesitate to contact us.

Sincerely,

A handwritten signature in cursive script that reads "Mark Lange".

Mark D. Lange
President and CEO