THE GEORGE WASHINGTON UNIVERSITY

WASHINGTON, DC

May 10, 2016

Jennifer Jessup, Departmental Paperwork Clearance Officer Department of Commerce, Room 6616 Washington, DC 20230

Via: jjessup@doc.gov

Re: Commodity Flow Survey (OMB Control Number 0607-0932)

Dear Ms. Jessup,

I am pleased to respond to the *Federal Register* notice of March 11, 2016 concerning the Census Bureau's plan to conduct the Commodity Flow Survey (CFS) in 2017. As a research professor at the George Washington Institute of Public Policy, I focus on policies that promote U.S. economic competitiveness. From this perspective, I find that the CFS is a particularly important federal activity. Data provided by the CFS on the transportation of goods across the nation are critical resources in the key realms of economic analysis, regional economic development, and transportation planning and investment.

However, the draft information collection request (ICR) for the CFS lacks a comprehensive, detailed description of the various uses of the CFS by federal agencies. Without such information, the full value of the CFS cannot be seen by the Office of Management and Budget (OMB), the Office of the Secretary of Commerce, the Office of the Census Director, and congressional appropriations and oversight committees.

Every five years, the Transportation Research Board sponsors a Commodity Flow Survey Workshop to prepare for the upcoming CFS. The <u>most recent workshop</u> took place on October 29, 2015 at the National Academies. My understanding is that each quinquennial CFS workshop reviews in detail the various uses of the CFS. For the Census Bureau's upcoming CFS ICR, and on the basis of the information provided at the 2015 CFS workshop, I request that the Census Bureau append a comprehensive listing (under ten pages) of the specific uses of the CFS by the individual federal agencies listed on pp. 2-3 of Supporting Statement Part A. I believe that such a listing will be highly valuable to the offices noted in the previous paragraph and will help ensure that the CFS receives the financial support it needs to conduct its important work.¹

I appreciate the opportunity to comment on the proposed CFS, hope that my suggestion is useful, and look forward to reading your submission to OMB.

¹ <u>This report of the 2005 CFS workshop</u>, for instance, offers great detail on the uses of the CFS.

Sincerely,

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Andrew Reamer Research Professor