
THE GEORGE WASHINGTON UNIVERSITY

WASHINGTON, DC

July 25, 2016

Office of Information and Regulatory Affairs
Attn: OMB Desk Officer for Census
Office of Management and Budget, Room 10235
725 17th St., NW
Washington, DC 20503

Via: OIRA_Submission@omb.eop.gov

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

Dear OMB Desk Officer,

I am pleased to respond to the *Federal Register* notice of June 16, 2016 concerning the Census Bureau's request to OMB (submitted June 24, 2016) 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 and worthy of strong support and approval from OMB. Data provided by the CFS on the transportation of goods across the nation are critical resources for economic analysis, regional economic development, and transportation planning and investment.

That said, I think the Census Bureau's information collection request has a weakness that is easily addressed. Specifically, the CFS supporting statement does not provide a full description of the various uses of the CFS by federal agencies. While Supporting Statement Part A2 lists nine federal agency users and supporters, it only describes a key use by one. In the absence of more information, the whole value of the CFS cannot be understood by OMB, the Office of the Secretary of Commerce, the Office of the Census Director, congressional appropriations and oversight committees, and stakeholders in the nation's transportation infrastructure.

Consequently, I ask that, as a condition of clearance, OMB direct Census Bureau to provide a comprehensive, detailed discussion (under ten pages) of the specific uses of the CFS by each of the federal agencies listed in Supporting Statement Part A. I suggest such information would be highly valuable to the organizations noted above and would help ensure that the Census Bureau and the Bureau of Transportation Statistics receive the financial support they need to conduct the CFS.

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

Sincerely,

A handwritten signature in black ink that reads "Andrew Reamer". The signature is written in a cursive, flowing style.

Andrew Reamer
Research Professor

