

THE GEORGE WASHINGTON INSTITUTE OF PUBLIC POLICY

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WASHINGTON, DC

July 14, 2015

Nora Kincaid, BLS Clearance Officer
Division of Management Systems
Bureau of Labor Statistics, Room 4080
2 Massachusetts Ave., NE
Washington, DC 20212

Via fax (202) 691-5111

Re: Proposed extension of Import and Export Price Indices

Dear Ms. Kincaid,

I am pleased to respond to the *Federal Register* notice of May 15, 2015 concerning the Bureau of Labor Statistics' plan to propose extension of the Import and Export Price Indices. 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 believe that the Import and Export Price Indices provide information critical to federal decision-making on trade and economic policies and to the competitive strategies of U.S.-based establishments. Therefore, I fully support a BLS proposal for the extension of the Import and Export Price Indices.

In its information collection request (ICR) to OMB, I ask that BLS include information on two topics:

- Innovative approaches to collection of prices data—The May 15 *Federal Register* notice alludes to new advanced information technology-based approaches to data collection, but does not provide substantial detail on their nature. Please indicate if and how BLS plans to enhance its collection of import and export prices data by expanding beyond surveys of importers and exporters to include non-survey forms of data collection such as "webscraping." It would seem that such forms of data collection, if feasible, have the potential to expand sample, reduce burden, or both.
- Global value chains and trade in value-added—Effective competitiveness policies require reliable, detailed understanding of global value chains (GVCs) that include U.S. firms and trade in value-added (TIVA) between the U.S. and other nations. The U.S. International Trade Commission and the Bureau of Economic Analysis are actively working with several multi-national organizations (including the UN, OECD, the WTO, and APEC) to develop useful statistical and accounting frameworks for mapping GVCs and measuring TIVA.¹ In the ICR, please provide information on the

¹ See, for instance, "Measuring Trade In Value Added: An OECD-WTO Joint Initiative" (<http://www.oecd.org/sti/ind/measuringtradeinvalue-addedanoecd-wtojointinitiative.htm>); "Guide to measuring global production," UNECE Task Force on Global Production (<http://www.unecce.org/statistics/about->

value of Import and Export Price Indices to federal efforts to map GVCs and measure TiVA. In particular, please identify:

- the value provided by current Import and Export Price Indices to federal efforts to map GVCs and measure TiVA;
- the extent to which current Import and Export Price Indices are insufficient to the task of accurately mapping GVCs and measuring TiVA; and
- the nature of steps required of BLS, the Department of Labor, OMB, and Congress if they were to address any shortfalls.

I appreciate the opportunity to comment on the proposed extension of the Import and Export Price Indices, hope you find my requests worthwhile, and look forward to seeing BLS's ICR.

Sincerely,



Andrew Reamer
Research Professor

[us/statstos/task-force-on-global-production.html](http://www.bea.gov/about/pdf/oecd-expert-group-on-extended-supply-use-tables-for-draft.pdf)); OECD Expert Group on Extended Supply-Use Tables (<http://www.bea.gov/about/pdf/oecd-expert-group-on-extended-supply-use-tables-for-draft.pdf>); "Report of the Friends of the Chair group on the measurement of international trade and economic globalization," UN Statistical Commission (<http://unstats.un.org/unsd/statcom/doc15/2015-12-TradeStats-E.pdf>); and "2015 Meeting of APEC Ministers Responsible for Trade" (http://www.apec.org/Meeting-Papers/Ministerial-Statements/Trade/2015_trade.aspx).