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**NF B**  
The Voice of Small Business  
1201 F Street NW, Suite 200  
Washington, DC 20004

Via PRAcomments@doc.gov  
and U.S. First Class Mail

2017 OCT 25 PM 2:45  
U.S. EXECUTIVE SECRETARIAT

October 20, 2017

The Honorable Wilbur L. Ross, Jr.  
Secretary of Commerce  
c/o Jennifer Jessup  
Departmental Paperwork Clearance Officer  
Department of Commerce, Room 6616  
14<sup>th</sup> and Constitutional Avenue NW  
Washington, DC 20230

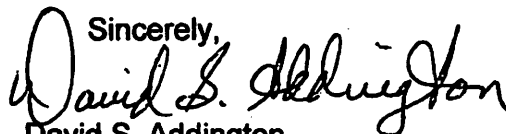
Dear Mr. Secretary:

RE: Comments on Census Bureau Notice on Proposed Information Collection;  
Comment Request; Manufacturers' Shipments, Inventories, and Orders (M3)  
Survey, 82 *Fed. Reg.* 48789 (October 20, 2017)

The National Federation of Independent Business (NFIB) submits these comments in response to the Census Bureau Notice dealing with Form M-3(SD), titled "Proposed Information Collection; Comment Request; Manufacturers' Shipments, Inventories, and Orders (M3) Survey," and published in the *Federal Register* of October 20, 2017. The Notice reflects shortcomings in Census Bureau efforts to comply with statutory (Paperwork Reduction Act) and presidential (Executive Order 13777) policies to minimize the burden that agency data collection imposes on the American people.

NFIB is an incorporated nonprofit association representing small and independent businesses, with approximately 300,000 members across America. NFIB protects and advances the ability of Americans to own, operate, and grow their businesses and, in particular, ensures that the governments of the United States and the fifty states hear the voice of small business as they formulate public policies.

Even though the Bureau's Notice estimates that 5,000 American businesses will spend 20 minutes each filling out the monthly form M-3(SD), the Bureau's Notice concludes: "Estimated Total Annual Cost to Public: \$0." Bureau professionals know better and recognize that time spent by business owners or employees to fill out Bureau forms is a cost to the public. The Bureau should reach an estimate of the total annual cost to the public of data collection through Form M-3(SD), determine whether the benefits of using Form M-3(SD) outweigh the costs, and publish a revised Notice reflecting the results.

Sincerely,  
  
David S. Addington

Senior Vice President and General Counsel