

**Supporting Statement**  
**U.S. Department of Commerce**  
**Bureau of Economic Analysis**  
**Benchmark Survey of Financial Services Transactions between**  
**U.S. Financial Services Providers and Foreign Persons**  
**OMB Control Number: 0608-0062**

**B. Collections of Information Employing Statistical Methods**

**1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g. establishments, State and local governmental units, households, or persons) in the universe and the corresponding sample are to be provided in tabular form. The tabulation must also include expected response rates for the collection as a whole. If the collection has been conducted before, provide the actual response rate achieved.**

The potential respondent universe for the BE-180 is all U.S. financial companies that are financial services providers or intermediaries, or whose consolidated U.S. enterprise includes a separately organized subsidiary, or part, that is a financial services provider or intermediary, and that had transactions (either sales or purchases) directly with foreign persons in all financial services combined in excess of \$3,000,000 in fiscal year 2014. Any U.S. person that receives the BE-180 survey form from BEA, but is not subject to the mandatory reporting requirements and chooses not to report voluntarily, must file an exemption claim by completing pages one through five of the BE-180 survey and returning it to BEA.

BEA intends to mail a notice to approximately 8,750 U.S. financial companies notifying the company of the requirement to file the survey and providing links to eFile, BEA's electronic filing system. BEA will estimate data for those respondents that do not report their data in a timely manner. Estimates will be based on prior reports and growth in a matched sample of respondents. BEA will allocate the estimated data by country and by type of transaction based on the distribution of reported transactions for inclusion in the published totals. Thus, estimates will cover the entire universe of transactions.

Response rates for the prior benchmark survey and the quarterly financial services surveys have been high, with a response rate of approximately 90%. BEA expects that these high response rates will continue for the benchmark survey, providing information of sufficient accuracy and reliability for its intended purposes.

**2. Describe the procedures for the collection, including: the statistical methodology for stratification and sample selection; the estimation procedure; the degree of accuracy needed for the purpose described in the justification; any unusual problems requiring specialized sampling procedures; and any use of periodic (less frequent than annual) data collection cycles to reduce burden.**

The BE-180 survey will be administered to U.S. financial companies. BEA expects most of the potential respondents to file the survey on a timely basis. In the case that a survey is not filed, or is filed too late to be used for the current estimate, BEA will generate an estimate based upon data previously reported or estimated for the non-respondent in conjunction with information on changes in the data for companies that did respond. No unusual problems have been identified that would require the use of specialized sampling procedures. BEA will attempt to collect data from the entire universe of firms meeting the reporting criteria.

The list of respondents will be derived from public and private sources, including business directories and establishment lists.

A high degree of accuracy is needed for the purposes stated in the justification. The proposed survey is a periodic benchmark survey conducted once every five years.

**3. Describe the methods used to maximize response rates and to deal with nonresponse. The accuracy and reliability of the information collected must be shown to be adequate for the intended uses. For collections based on sampling, a special justification must be provided if they will not yield "reliable" data that can be generalized to the universe studied.**

Any financial company subject to the reporting requirements of the BE-180 would be required to respond whether or not they are contacted by BEA. A response must be received by filing a completed form BE-180 or a valid exemption claim. Non-respondents will be contacted by BEA staff and, in the event of continued nonresponse, will be referred to the Office of General Counsel for further action. BEA expects that at the time of the final revised estimates, reports will be received from nearly all companies required to report. To facilitate response, a notice will be sent to each company notifying the company of the requirement to file the survey and providing links to eFile, BEA's electronic filing system, and an Excel version of the survey.

**4. Describe any tests of procedures or methods to be undertaken.**

In October of 2014, BEA contacted the nine largest reporters currently filing brokerage fees on the quarterly BE-185 survey to determine the feasibility of expanding upon the data that are collected pertaining to brokerage activities. Respondents were asked if they would be able to report values associated with market-making activities by type of security and if they could identify net earnings from these activities, either in total, or with foreign counterparties. Based on the results of this investigation, and the burden impact on reporting companies, BEA decided not to add the additional detail on brokerage fees to the BE-180 survey.

**5. Provide the name and telephone number of individuals consulted on the statistical aspects of the design, and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.**

The survey is designed and conducted within BEA by the Balance of Payments Division. For further information, contact Chris Stein via email at [christopher.stein@bea.gov](mailto:christopher.stein@bea.gov) or by phone at 202-606-9850.