

**Attachment H**

**Department of Commerce  
United States Census Bureau  
OMB Information Collection Request  
2017 Economic Census  
OMB Control Number 0607-XXXX**

**Consultations with Federal Agencies, Trade Groups, Corporations, and Consulting Firms:  
Selected Correspondence**

**From:** Richard Kowalski <rkowalski@ce.org>  
**Sent:** Friday, October 30, 2015 2:14 PM  
**To:** EWD EC17 Association (CENSUS/ OTHER)  
**Cc:** info@ce.org  
**Subject:** Review of 2017 Economic Census questionnaires

Dear Jack Moody,

I am writing you in regards to your letter to Gary Shapiro, President and CEO of the Consumer Electronics Association, and in regards to the 2017 Economic Census Notice Of Determination And Request For Comment.

Focusing on your question "What do your data users need that we are not asking?" the recommendations of the Consumer Electronics Association are as follows. Almost all of these apply to question 22 of the survey, and represent emerging categories of interest in the consumer electronics industry.

**[MC-33371](#) [PDF] Special Dies, Tools, Jigs, Fixtures and Mold Manufacturing**

- Add 3D printers (aka additive manufacturing) – devices that can make a three dimensional solid object from a digital model. Used in manufacturing / design settings for prototyping, but becoming popular in the consumer space. They may also go under Computing and Office Machines with other printers or peripherals.

**[MC-33313](#) [PDF] Photographic Equipment and Supplies**

- Add action camcorders/wearable cameras such as the Go Pro.

**[MC-33401](#) [PDF] Computing and Office Machines**

- Add 3D printers (aka additive manufacturing) if they do not fit in elsewhere.

**[MC-33403](#) [PDF] Radio Receivers and Television Sets and Related Equipment**

- Would be nice to see more itemization of products in 22.15 if possible.

**[MC-33407](#) [PDF] Clocks, Watches, and Watchcases**

- Add smart watches, defined as watches that pair with a mobile device such as a computer or phone to receive and display information and calls.

**[MC-33503](#) [PDF] Household Appliances**

- Add domestic robots used for household chores such as the iRobot Roomba or Ecovacs Winbot.

**[MC-33601](#) [PDF] Motor Vehicles and Passenger Car Bodies**

- Add self-driving vehicles.

**[MC-33609](#) [PDF] Aircraft Industries**

- Add unmanned aerial vehicles (UAV) (aka 'drones') for civilian use. Examples: 3D Robotics Solo, DJI Phantom.

**[MC-33908](#) [PDF] Toys, Games, Dolls, and Children's Vehicles, Exc. Bicycles**

- Add virtual reality / augmented reality glasses like Oculus VR and Vuzix M100 (these may fit under question 22.7).

**[MC-33973](#) [PDF] Sporting and Athletic Goods**

- Add health and fitness tracking devices such as Fitbit and Jawbone products (aka fitness bands, wearables).

**[RT-44103](#) [PDF] Automotive Parts, Accessories, and Tire Stores**

- It would be nice to know which of these stores either sell audio/video equipment for cars and/or whether they offer installation services.

Thank you for your consideration

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**From:** Frauenheim, Steve <SFrauenheim@eei.org>  
**Sent:** Saturday, October 31, 2015 11:21 PM  
**To:** EWD EC17 Association (CENSUS/ OTHER)  
**Subject:** 2017 Economic Census

Dear Mr. Moody,

Thank you for allowing the Edison Electric Institute (EEI) the opportunity to provide feedback on the 2017 Economic Census.

Henri Bartholomot of EEI General Counsel and I have reviewed the Utilities Sector Consolidated Report Forms and we do not have any proposed changes to the form at this time.

Sincerely,

Steve Frauenheim  
Manager, Business Information Group  
Edison Electric Institute  
[sfrauenheim@eei.org](mailto:sfrauenheim@eei.org)  
202-508-5580

**From:** McConnell, Anne <AMcConnell@toyassociation.org>  
**Sent:** Friday, October 30, 2015 3:48 PM  
**To:** EWD EC17 Association (CENSUS/ OTHER)  
**Cc:** McConnell, Anne  
**Subject:** Economic Census 2017

Your letter to Carter Keithley regarding the Economic Census has been forwarded to me. In reviewing form MC-33908, the Toy Industry Association (TIA) is providing the following feedback.

With respect to section 22, below are the general toy categories that more closely represent and are tracked by the traditional toy industry.

- Action Figures/Accessories/Role Play
- Arts & Crafts
- Building Sets
- Dolls & Accessories (includes doll clothes, doll houses, doll furniture, doll carriages and other accessories)
- Games & Puzzles (does not include video games and consoles)
- Infant / Preschool
- Youth Electronics (designed for children, includes robotic toys)
- Outdoor & sports toys
- Plush
- Toy vehicles (powered and non powered)
- Other

Note: Video Games & Consoles, Pet Toys and General Book Printing and Binding are not captured as part of the traditional toy industry.

In addition, we recommend you include a line item for royalties/license fee income. Licensed toys represented about 30% of toys sold in 2014 (according to The NPD Group). They are increasingly popular given blockbuster movies.

For your record, Carter Keithley retired from the Toy Industry Association in May, 2015. He is succeeded by Stephen Pasierb as President and CEO.

Please let me know if you have any questions.

*Anne McConnell*  
*Senior Director, Market Research & Data Strategy*  
*Toy Industry Association, Inc.*  
*1115 Broadway, Suite 400*  
*New York, NY 10010*

*email: amconnell@toyassociation.org*  
*Tel: 646-520-4870*  
*Fax: 212-633-1429*

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**From:** Clay Jones <cjones@gamfg.org>  
**Sent:** Friday, October 30, 2015 10:18 AM  
**To:** EWD EC17 Association (CENSUS/ OTHER)  
**Subject:** 2017 Economic Census

To: Jack Moody, Assistant Survey Director, Economic Census, U.S. Census Bureau

Dear Mr. Moody,

Thank you for sending the census survey to our office. It was addressed to our President, G.L. Bowen, but I am the Vice President and General Counsel and have been in charge of reviewing the information. The forms that would be applicable to the members of our association (from 2012) appear to be pretty thorough. I know you will be making some updates for the 2017 census.

I really only had one comment based on my review: we represent the flooring industry in Georgia as part of our Association. I reviewed several forms including the "carpet and rugs" form. Perhaps this information is captured somewhere else in another survey form, and if so, please disregard the comment. However, while there were references to all types of carpets and rugs (including modular carpet tiles), I didn't see references to all types of flooring materials, including hard surfaces. For example, solid wood, engineered wood, laminate, vinyl, linoleum, ceramic – these types of flooring have really become part of what is sold by what we used to refer to as "the carpet industry" – we really call it the flooring industry now because of the diversity of soft and hard flooring surfaces they sell.

Again, you may have included this terminology in another form but I thought you should know that many in the industry have expanded their product offerings as I've described.

If you have any questions, please don't hesitate to contact me. Good luck with the **census!**

Best regards,

Clay Jones

Charles B. Jones, III ("Clay")  
Georgia **Association** of Manufacturers  
The Hurt Building  
50 Hurt Plaza, Suite 985  
Atlanta, Georgia 30303  
404-688-0555  
404-584-0720 (fax)  
[cjones@gamfg.org](mailto:cjones@gamfg.org)

**From: Robert Roche <RRoche@ctia.org>**  
**Sent: Wednesday, October 28, 2015 10:24 AM**  
**To: EWD EC17 Association (CENSUS/ OTHER)**  
**Subject: 2017 Economic **Census** Questionnaire**

Jack B. Moody  
Assistant Survey Director, Economic **Census**  
Economy-Wide Statistics Division  
U.S. **Census** Bureau

Dear Mr. Moody,

Thank you for asking CTIA-The Wireless **Association**<sup>®</sup> for comments regarding the content of the 2017 Economic **Census** questionnaire. CTIA's CEO, Meredith Attwell Baker, asked me to respond on her behalf. As requested, I reviewed the previous **Census** form, specifically OS-81302, "Civic, Social, and **Other** Membership Organizations," as it applies to Business **Associations**.

After reviewing the questionnaire and the information sheet that provides guidance for completing the form, I concluded that the form (1) uses terms and definitions that are generally clear and appropriate; (2) includes the principal questions that are applicable to CTIA; and (3) the instructions provide sufficient explanation to make possible completion of the requested form.

No additional questions seem necessary to capture the relevant data.

If you have any questions, or require a further response, please do not hesitate to contact me at (202) 736-3255, or [rroche@ctia.org](mailto:rroche@ctia.org).

Again, thank you for requesting CTIA's input with respect to the 2017 Economic **Census**.

Robert F. Roche, Ph.D.  
*Vice President, Research*  
**CTIA-The Wireless Association**<sup>®</sup>  
*Expanding the Wireless Frontier*<sup>™</sup>  
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Washington, DC 20036  
<http://www.ctia.org>  
Direct: 202.736.3255 Main: 202.785.0081  
Wireless: 202.674.1713 Fax: 202.736.3688

**From:** Diane Mirowski <diane@amptp.org>  
**Sent:** Monday, October 19, 2015 11:08 AM  
**To:** **EWD EC17 Association (CENSUS/ OTHER)**  
**Cc:** carol; Mary Vigiano  
**Subject:** Survey Response re 2017 Economic **Census** Questionnaires (EC-G-LGA)

Dear Mr. Jack Moody:

October 27, 2015

Per your request of Nancy Somerville, executive vice president and CEO of the American Society of Landscape Architects, below are suggestions to clarify form PS-54103, 2012 Economic Census for Architectural and Landscape Architectural Services, in anticipation of the next census.

We would also like to receive, if possible, all of the results of the 2012 census for this category to better assess the state of the landscape architecture profession among other like services.

Thank you.

P. 3, Question 19

Box 541 310 00 9, expand to clarify:

2012: Landscape architectural and design services, excluding maintenance and installation.”

SUGGESTED REVISION: “Landscape Architecture and design services, including parks, plazas, campuses, and residences, but excluding maintenance and installation.”

19.Sports facility design is becoming increasingly specialized. It might be appropriate to include a category for “sports facilities.”

Parks have been grouped with airports and highways. Parks merit its own category and the other is best described as “transportation facilities including airports and highways.”

Box 541 320 00 6, suggested edits

2012: “Land use planning and design services, including parks, airports, and highways.

SUGGESTED REVISION: “Land use planning and services, including infrastructure, airports, and highways.”

Box 54`1 320 00 6, expand to clarify

2012: “Landscape consulting services.”

SUGGESTED REVISION: "Landscape consulting services (include expert witness services)."

Box 541 320 00 B, expand to clarify

2012: "Garden design services"

SUGGESTED REVISION: "Garden design and/or horticultural services"

P. 4, Question 20

Option 5, add to clarify

2012: "All other business firm and organizations (manufacturing, utilities, mining, shopping centers, office buildings, etc.)."

SUGGESTED REVISION: "All other business firm and organizations (hospitality/resorts, manufacturing, utilities, mining, shopping centers, office buildings, etc.)."

P. 5, Question 21

This question needs to be clarified, but we cannot figure out what it is you are trying to determine to suggest any revisions.

P. 6, Question 22

22.2b(2): "Sports facilities" should be separate from hotels and convention centers and should incorporate stadiums, and possibly arenas.

Line 2c(2), mixed projects may provide misleading results; we suggest breaking this up, adding a new line item.

2012: "Report receipts from landscape architecture services that consist of a complete project or phase of a project for recreation or open space projects where activity is not enclosed in a building. Include fields for football, soccer, baseball; golf courses; ski areas, restoration of wetlands or other natural areas; and services for parks, greenways or trails. ...."

SUGGESTED REVISIONS:

1) Eliminate restoration options: Report receipts from landscape architecture services that consist of a complete project or phase of a project for recreation or open space projects where activity is not enclosed in a building. Include fields for football, soccer, baseball; golf courses; ski areas; ~~restoration of wetlands or other natural areas~~; and services for parks, greenways or trails. ...."

2) Add new line item: "Report receipts from landscape architecture services from restoration of wetlands, rehabilitation of brownfields, and other ecological services."

Add 22.2d Landscape architectural services for "Environmental Impact Assessments." Visual and recreational analysis is a significant portion of work for many landscape architecture offices.

**Suggestion for a new question to consider adding:**

What was your firm's ROI for the last fiscal year? (Return on Investment)

This could be summarized by size of firm. Based upon current questions, revenues could be increasing in firms, but the ROI may not be increasing. The true measure of economic health of landscape architectural firm or any type of company is the ROI, or ROI times the revenue.

**From:** kenneth O'Brien <kobrien@geminishippers.com>  
**Sent:** Thursday, October 22, 2015 7:21 PM  
**To:** EWD EC17 Association (CENSUS/ OTHER)  
**Cc:** Sara Mayes  
**Subject:** Comments

Att: Mr. Jack Moody

Following up on your letter to our President / CEO. Sara Mayes, we have reviewed the forms ( TW48801 TW 48360) and have no further suggestions at this time.  
The forms are clear, questions readily answerable and the direction sections clear to the user.

Thanks for including us in the survey.

Best Regards  
Ken

**Kenneth O'Brien**  
Chief Operating Officer  
Gemini Shippers Association/  
Fashion Accessories Shippers Association  
137 W. 25th Street, 3rd Floor, New York, NY 10001  
(212) 947-3424 Office  
(201) 696-2119 Cell  
[www.geminishippers.com](http://www.geminishippers.com)

**From:** Frederick Lawrence <flawrence@ipaa.org>  
**Sent:** Wednesday, October 21, 2015 10:37 AM  
**To:** EWD EC17 Association (CENSUS/ OTHER)  
**Subject:** Forms

Dear Sir,

The forms for E&P look ok to me. I have circulated to my colleagues and we have not found anything that needs correction as of yet.

I believe that the questionnaires and instructions are accurate and relevant to the current state of the industry.

I am travelling but will get back to you if I find anything that needs to be added.

Best,  
Fred

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Frederick J. Lawrence  
IPAA  
Vice President of Economics & International Affairs  
(202) 857 4722



**From:** Susan Chesniak <chesniak@mail.mlahq.org>  
**Sent:** Tuesday, October 20, 2015 4:37 PM  
**To:** EWD EC17 Association (CENSUS/ OTHER)  
**Cc:** chesniak@mail.mlahq.org  
**Subject:** 2017 Survey Questionnaire

To Whom it may Concern:

Per your request, below please find comments on existing survey inquiries:

- 1) The survey does not use terms/definitions common in our industry (Professional Member Based Association). In fact, we were unable to find a "Form" that specifically related to Professional Associations. The closest category for comparison was "Professional, Scientific, and Technical Services".
- 2) Does not accurately reflect what is occurring in our industry. No questions relating to non-profit Professional Associations. Question 16 "Selected Expenses" -- no line items accurately reflect our expenses. Question 19 "Kind of Business Activity" should include Professional Associations. Question 22 "Detail of Sales, Shipments, Receipts or Revenue" -- no line item accurately reflects our revenues
- 3) Users need data on membership statistics, dues, revenue and expense line items that reflect activity of member based organizations. For example, data on Membership Dues, Continuing Education, Publications, etc.
- 4) Did not find any questions to be no longer relevant. Majority of questions were not applicable to our organization
- 5) Question were only difficult to complete in that majority were inapplicable to our organization.
- 6) Instructions were relatively clear.
- 7) As noted above, it would be helpful if the Census was more inclusive of member based professional associations/organizations.

For your reference, attached please find a pdf of the original letter requesting above information.

Kind regards,  
Susan Chesniak

**From:** Donald Santa <Dsanta@ingaa.org>  
**Sent:** Tuesday, October 20, 2015 11:33 AM  
**To:** EWD EC17 Association (CENSUS/ OTHER)  
**Subject:** Survey on economic census

I've received a letter from you requesting comment on the previous forms used for the economic census. To my knowledge, the Interstate Natural Gas Association of America has not completed these forms in the past, so we have no basis on which to provide comments that might be used in updating the forms.

Thank you for soliciting our input.

Donald F. Santa  
President and CEO  
Interstate Natural Gas Association of America

**From: Christopher Runyan <CRunyan@ohiocontractors.org>**  
**Sent: Tuesday, September 22, 2015 4:23 PM**  
**To: EWD EC17 Association (CENSUS/ OTHER)**  
**Subject: Comments on Census Form #CC-23701**

Dear Sir/Madame,

The Ohio Contractors Association represents contractors in the heavy/highway in the State of Ohio. I have reviewed Census Form #CC-23701 and provide the following comment:

Utilization of prime and subcontracting firms that have a Disadvantage Business Enterprise (DBE) certification is a major issue here in Ohio and around the nation. To better understand and define the use of DBE firms, I suggest making the following inquiries:

- Are you a certified Disadvantaged Business Enterprise firm?
- If so, what percentage of total work that you performed in calendar year XXXX was credited as DBE-eligible by either your firm as a prime contractor or by a prime contractor when you firm provided subcontracted services?
- What North American Industry Classification System Code(s) have been assigned to your firm?

Thank you for the opportunity to comment.

Respectfully yours,

Christopher L. Runyan, P.E.  
President  
crunyan@ohiocontractors.org

**From: Diane Mirowski <diane@amptp.org>**  
**Sent: Monday, October 19, 2015 11:08 AM**  
**To: EWD EC17 Association (CENSUS/ OTHER)**  
**Cc: carol; Mary Vigiano**  
**Subject: Survey Response re 2017 Economic Census Questionnaires (EC-G-LGA)**

Dear Mr. Jack Moody:

I am responding on behalf of Ms. Carol Lombardini, President, Alliance of Motion Picture and Television Producers, to your letter, received on October 5, 2015, regarding comments on the usefulness of existing inquiries for inclusion in the 2017 Economic Census questionnaires. We have reviewed the 2012

**Census** Form for Independent Artists, Writers, and Performers (Form No. AE-71105) and Classification Form (Form AE-71191). Please find below our responses in **bold-face font** to your survey questions.

- (1) Do the survey questionnaires and instructions use terms/definitions that are common for your industry? **Yes.**
- (2) Does the questionnaire accurately reflect what is occurring in your industry? **Yes.**
- (3) What do your data users need that we are not asking? **Operating costs other than payroll. The Census form requests information regarding the cost of payroll and employment and the total receipts received in connection with business activities. Without information as to other operating costs associated with business activities, the overall economic picture is incomplete.**
- (4) What questions are no longer relevant and could be eliminated? **None.**
- (5) Are certain questions difficult to complete? Why? **No.**
- (6) Are instructions clear and helpful? **The instructions at the beginning of the form states that the reporting unit is for an establishment, defined as "a single physical location where business is conducted or where services or industrial operations are performed." Motion picture (feature film and television) production is not limited to a single physical location. By limiting the reporting unit for the form to a single physical location, a large portion of motion picture production would be excluded.**
- (7) Are there any other comments or opinions with regard to your industry questionnaire? **No.**

Best,

**Diane P. Mirowski**

Vice President, Research and Labor Economics  
Alliance of Motion Picture and Television Producers  
15301 Ventura Blvd., Bldg. E, Sherman Oaks, CA 91403  
direct 818.935.5966 | fax 818.285.4450

**From: ron@giuntinicompany.com <ron@giuntinicompany.com>**

**Sent: Monday, October 12, 2015 3:32 PM**

**To: EWD EC17 Association (CENSUS/ OTHER)**

**Subject: Comment on form OS-81103 Commercial, Industrial, and Electronic Equipment Repair and Maintenance services**

I was requested to comment on the improvement of the subject form.

This area of the **census** is deeply flawed. I have worked in the area of industrial repair/maintenance for 35 years. I have been engaged by the US Int. Trade Commission to assist them in harmonizing many of the terms in this area.

You are understating the activity in this area materially. Employee wise there are at least 50-75% more individuals involved and the

revenues in this area are an estimated \$300 billion/year.

Much of the economic activity in this sector is supplied by the product support/aftermarket enterprises of machine builders and their key suppliers/manufacturers; I suspect that this fact is not captured in this sector. Also 30-50% of all light vehicles sold are classified as fixed asset as short-term rental, operating lease of company fleets. The maintenance of these vehicles should be in the industrial sector not motor vehicle.

Also note that the military employs much commercial products and their products are managed/maintained by service organizations.

I believe that our government can do a much better job of reporting this space. The investment community, government policy makers and many other would benefit from a fresh approach at collecting data for this area.

Do not hesitate to contact me if you have any questions.

Regards,  
Ron Giuntini  
Practice Leader, Business Case Development for Commercial and Military  
Product Support/Aftermarket Solutions  
Giuntini & Co.  
570.713.4795  
ron@giuntinicompany.com  
[www.giuntinicompany.com](http://www.giuntinicompany.com)

**From: Steven Pedracine <steve@mnlath-plaster.com>**  
**Sent: Wednesday, October 7, 2015 4:12 PM**  
**To: EWD EC17 Association (CENSUS/ OTHER)**  
**Subject: 2012forms/CC23803**

Census Bureau,

This is in review of the captioned form.

The Minnesota Lath and Plaster Bureau is recognized as an education and technical spokesman for the lath and plaster industry. It provides services to architects, the construction community and the public on a variety of matters relating to the plaster trades. We are here specifically to promote plastering on behalf of the signatory union plastering contractors of the Twin Cities.

The form captioned above does not pertain to the relevance of the Minnesota Lath and Plaster Bureau as we do not engage in lathing and plastering work, but as an ancillary entity.

The only issue I have found that may be of interest to your questionnaire is that in item 22 you segregate

"plastering, lathing, or fresco contractor" from "stucco contractor." Both plastering and stuccoing are crafts within the same trade. I would not even consider "fresco" as part of plastering because it is more an art than a craft within the plastering trade. Other crafts within "plastering" include: veneer plaster, venetian plaster, fire proofing, ornamental plaster and exterior insulation finish systems.

Sincerely,

Steven Pedracine  
**Steven Pedracine CSI, CDT, CEI**  
**Minnesota Lath & Plaster Bureau**  
Executive Director  
10600 University Ave. NW, Suite 3  
Coon Rapids, MN 55448  
phone: (763) 757-MLPB (6572)  
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e-mail: [steve@mnlath-plaster.com](mailto:steve@mnlath-plaster.com)  
[www.mnlath-plaster.com](http://www.mnlath-plaster.com)

**From: Magi Plis <Magi.Plis@i-car.com>**  
**Sent: Wednesday, October 7, 2015 4:04 PM**  
**To: EWD EC17 Association (CENSUS/ OTHER)**  
**Subject: Review of Previous Census Forms, Inter-Industry Conference on Auto Collision Repair**

Good afternoon,

Per the US Census Bureau's request, please see the below comments to the 2012 Educational Services Form (ED-61101). Below is the link of the 2012 survey reviewed for our industry.

<https://bhs.econ.census.gov/2012forms/ED61101.pdf>

INFORMATION COPY TO REPORT DO NOT USE

bhs.econ.census.gov

Form ED-61101 (11-16-2011) Page 2 CONTINUE ON PAGE 3 61101028 2 PHYSICAL LOCATION -  
Continued (Mark "X" only ONE box.) B. Is this establishment physically located ...

**Do the survey questionnaires and instructions use terms/definitions that are common for you industry? – YES**

**Does the questionnaire accurately reflect what is occurring in your industry? – YES**

**What do your data users need that we are not asking? – N/A**

**What questions are no longer relevant and could be eliminated? – NONE**

**Are certain questions difficult to complete? Why? – YES, #7 Employment and Payroll, Letter A.**

**Number of employees for period including March 12. Do they mean the pay period up to March 12, 2015 or just in March 2015?**

**Are instructions clear and helpful? – YES**

**Are there any other comments or opinions with regard to your industry questionnaire? – NO**

Should you have any questions or need additional information please contact me at 847-463-5229.

Kind Regards,

Magi Plis

**From:** John J. Kelly <johnk@jedec.org>  
**Sent:** Thursday, October 1, 2015 3:02 PM  
**To:** EWD EC17 Association (CENSUS/ OTHER)  
**Subject:** US Census Bureau Survey

Dear Sirs:

As requested in your recent letter, my comments are as follows:

- I find that the information and layout contained in Form OS-81302 is much more useful and relevant than the information and layout contained in Form SA-81300E which is the form we typically receive and are asked to submit.
- In Form SA-81300E the issues are as follows:  
Sales, Receipts or Revenue
  - It may be useful to separate out membership dues or specify that this is considered part of program revenue as this can be a major income source
- E-Commerce
  - Many organization now get a majority of their revenue via internet/web transactions. This is not typically tracked separately so being able to report an accurate amount separately is challenging.

John J. Kelly  
President  
JEDEC

**From:** Jackie Leach <jleach@westernotb.com>  
**Sent:** Monday, September 28, 2015 12:12 PM  
**To:** EWD EC17 Association (CENSUS/ OTHER)  
**Cc:** Mike Kane  
**Subject:** Economic Census Questionnaire

Good Afternoon Jack:

I reviewed the census forms applicable to Western Region and the questions appear to be relevant and appropriate to Western's business.

Regards,  
**Jacquelyne Leach**  
Comptroller

Western Regional Off-Track Betting Corporation  
8315 Park Road  
Batavia , New York 14020  
work: 585 343-3750 x221  
fax: 585 343-6873  
email: jleach@westernotb.com

**From:** Calvin Schnure <CSchnure@nareit.com>  
**Sent:** Friday, September 25, 2015 1:06 PM  
**To:** EWD EC17 Association (CENSUS/ OTHER)  
**Cc:** Mike Grupe  
**Subject:** NAREIT response to U.S. Dept of Commerce letter on Economic Census for REITs

Dear Sirs,

This email is in response to the letter from Jack B. Moody to Steven Wechsler, President and CEO of NAREIT, regarding the 2017 Economic Census questionnaires.

NAREIT®, the National Association of Real Estate Investment Trusts®, is the worldwide representative voice for REITs and publicly traded real estate companies with an interest in U.S. real estate and capital markets. We represent a large and diverse industry including both equity REITs, which own commercial properties, and mortgage REITs, which invest in mortgage securities, both residential and commercial.

NAREIT has reviewed the questionnaires for the 2017 Economic Census per the letter from Mr. Moody, which requested comment on the sections applicable to REITs.

Overall, we find that the forms and instructions for Equity REITs are clear and are relevant. The forms for Mortgage REITs, however, are less clear, and do not appear to have questions covering commercial mortgages.

#### **Equity REITs**

- Equity REITs are clearly identified in the FAQ for “RE-53160 Real Estate Lessors”;
- Equity REITs should file form RE-53190, “Real Estate Lessors Classification” and also form RE-53160, “Real Estate Lessors”;
- Equity REITs of several types (including apartment, office, hotel, senior housing, industrial, shopping malls) are clearly identified in the form; and
- The form RE-53160 requests information on relevant concepts for Equity REITs: gross rents, and sales of real property or buildings, and also employment and payroll.

#### **Mortgage REITs**

The forms for Mortgage REITs, however, are somewhat more difficult to identify:

- The FAQ under Real Estate notes that mortgage REITs would be classified under Sector 52, Finance and Insurance.
- The instructions for Finance and Insurance sector, however, are somewhat unclear as they do not specify mortgage REITs as a type of firm in this sector. Our understanding of the NAICS classification scheme indicates that mortgage REITs fall under 525: Funds, Trusts and Other Financial Vehicles; 525990: Other Financial Vehicles. We could not locate this option

on the menu included in the questionnaire. The closest category that we could find was “Nondepository Credit Intermediation”.

- Form FI-52205 is required for Finance and Insurance, Nondepository Credit Intermediation. There is no option for “Mortgage REIT” under “Kind of business” (question 19). Presumably, mREITs would select the first option, which is “Mortgage banker, mortgage company, or loan correspondent” or perhaps “Nonfederal secondary market firm”, or perhaps “Other nondepository credit—specify: ”
- The form should specify whether the mortgage REIT is primarily involved in lending to support residential real estate or commercial real estate;
- The items requested for this category identify interest income from residential mortgages. There is no category for commercial mortgages.

Please feel free to contact me if you have further questions about our comments.

Best regards,

Calvin Schnure  
Senior Vice President, Research & Economic Analysis  
NAREIT  
202-739-9434

**From:** Scott Williamson <williamson@reinsurance.org>  
**Sent:** Monday, September 21, 2015 9:33 AM  
**To:** EWD EC17 Association (CENSUS/ OTHER)  
**Cc:** Joseph Sieverling  
**Subject:** 2017 Economic Census Questionnaire

Thank you for the opportunity to comment on the questionnaire. My comments are applicable to the P&C insurance industry only.

#### **Form FI-52451 Question 19**

**Reinsurance Carriers 0701-524 130 00 4:** I recommend striking “and liability”. This is redundant with “and casualty” in the previous item (0701-524 130 00 5) and could create confusion. If the purpose of survey item is to measure mono-line and or financial reinsurance, it may be appropriate to ask for financial guaranty and mortgage guaranty in addition to surety and fidelity.

#### **Form FI-52451 Question 26**

**26 Special Inquiries A-Direct Losses Incurred and Administrative Expenses Activity 8 Property and Casualty Reinsurance:** There are no direct losses with respect to reinsurance--there can only be assumed, ceded or net losses. I recommend either changing the heading for Question A to say “Gross Losses” instead of “Direct Losses” or delete activity 8. For this same reason, it may be appropriate to delete “including reinsurance” from Activity 10 (All other activities”).



**26 Special Inquiries B-Direct Premiums Earned:** There are **other** types of property and casualty lines of business than the 7 types listed. I recommend including an item for “all **other** direct premiums earned” so that the Total for item 8 reflects all direct premiums earned by the filer.

Note that both 26 A and 26 B are for **Direct** insurance. However only 26 A includes items for reinsurance. 26 A and 26 B should be more closely coordinated, and it should be clarified whether the reporting basis is **Gross** (direct plus assumed reinsurance) or **Direct**.

Please contact me if you have any questions concerning these comments,

Best regards,

**W. Scott Williamson, MBA, ARe**  
**Vice President &**  
**Director of Financial Analytics**  
**202.783.8311**

**From: Jeff Kurowski <JKurowski@rvda.org>**  
**Sent: Friday, September 18, 2015 4:05 PM**  
**To: EWD EC17 Association (CENSUS/ OTHER)**  
**Subject: comments from RVDA**

September 18, 2015

To: Jack B. Moody, Assistant Survey Director, Economic **Census**

From: Jeff Kurowski, Director of Industry Relations, RVDA

Thank you for providing the opportunity to offer suggestions for improving the 2017 Economic **Census**. RVDA uses Economic **Census** data to update members and the RV industry on the economic impact of RV retailing across the country. It is a valuable resource for the national RV dealers **association** and state RV **associations**. It is within the RV rental sector where RVDA believes the next economic **census** can be improved.

#### **Specific Comments to Improve the Survey:**

In the 2012 Economic **Census**, the rental of recreation vehicles (RVs) was tracked under two products and services codes: Truck, utility trailer and RV rental and leasing (Code 52520), and Rental or lease of recreation vehicles (Code 29922). Where RVDA believes the improvement can be made is by separating RV rental and leasing from Code 52520.

My understanding is Code 29922 includes the retailers whose primary business is selling RVs, with RV rentals being one of several different auxiliary sources of revenue. Meanwhile, Code 52520 includes businesses primarily involved in renting RVs and/or utility trailers or trucks. I know from checking their websites that the national, multi-location RV rental businesses only rent RVs. They also sell to retail buyers, as a side business, the RVs that were used by customers during several rental seasons, but they

do not rent or sell utility trailers or trucks. Also, there are several single location companies primarily involved in renting RVs, but not renting utility trailers or trucks. Consequently, it appears the businesses involved in renting RVs can be separated from those renting trucks and/or utility trailers.

But would the sample size be too small? According to the 2012 Economic **Census**, RV dealers rented RVs from 300 locations (establishments) for total revenue of almost \$1.7 billion, while the companies renting trucks, utility trailers and RVs operated from 1,104 locations for total revenue of almost \$3.8 billion. I cannot say this with certainty, but those numbers suggest the volume done by the companies whose primary business is RV rentals is large enough to be tracked as a separate business within the rental sector.

RV rentals is a segment of the RV industry that is growing in importance, and separating RV rentals from the rental of trucks and utility trailers would provide more precise data, and would allow RVDA to better follow trends within that sector.

Again, thank you for the opportunity to comment on the Economic **Census**. Please contact me directly at (703) 591-7130 (x 121) or [jkurowski@rvda.org](mailto:jkurowski@rvda.org) if you have any questions.

**From:** Glenn B. Gastwirth, DPM <GBGastwirth@apma.org>  
**Sent:** Thursday, September 10, 2015 4:02 PM  
**To:** EWD EC17 Association (CENSUS/ OTHER)  
**Subject:** comments regarding 2017 Economic **Census** Questionnaire

The American Podiatric Medical **Association** (APMA) appreciates the opportunity to comment on the content that will be used in the 2017 Economic **Census** questionnaires. Using the 2012 Economic **Census** questionnaire, we would like to make the following suggestions:

1. Question #19 Kind of Business or Activity (page 3), "Physician services ( include physicians with the degree of M.D. or D.O.)" should include DPMs. Podiatrists universally provide physician services to their patients. DPMs receive compensation from the Medicare program through the Medicare Physician Fee Schedule. DPM services are universally reported using CPT codes "...the most widely accepted medical nomenclature used to report medical procedures and services under public and private health insurance programs."
2. Question #22 Detail of Sales, Shipment, Receipts or Revenue (page 5). All references to ICD-9 codes should be changed to ICD-10 codes.
3. Question #26 Personnel by Occupation. Question # 1 should be changed as follows: Doctors/ Allopathic Physicians-licensed practitioners having M.D. degree.

APMA will be happy to assist the US Department of Commerce in achieving a high response rate from podiatrists if you give us advance notice of the release of the **census** questionnaires.

Glenn B. Gastwirth, DPM  
Executive Director and CEO  
American Podiatric Medical **Association**  
9312 Old Georgetown Road  
Bethesda, Maryland 20814  
301-581-9250

**International  
Association of  
Amusement Parks  
and Attractions**

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[www.IAAPA.org](http://www.IAAPA.org)



**IAAPA**

Mr. Jack B. Moody  
Assistant Survey Director, Economic Census  
U.S. Census Bureau  
Washington, DC 20233-0001

Dear Mr. Moody:

Thank you for the opportunity to review the 2012 Economic Census forms. After our review, we have these comments and suggestions for the 2017 form:

FORM AE-71303

- 1) In Section 19 - Kind of Business or Activity
  - a. Remove “exhibitions” from *Amusement parks, exhibitions and other attractions*. It does not make sense in this context.
  - b. The description for 713 120 002 should include bowling as in “go-kart track, bowling, etc.”
  - c. We feel 713 120 00 5 (Family fun center, children’s entertainment, or children’s party center) is very vague and should be combined with 713 120 002
  - d. The description for 713 110 20 1 should be changed to “Amusement park or theme park which could include a water park and/or kiddie park
  - e. The description for 713 990 80 E should include these new attraction categories in the examples to be more comprehensive: inflatables, ziplines, trampoline center, bowling center.
  - f. For 777 713 01 1, the descriptions should be “other parks or attractions.”
  - g. For the coin machine operator, it needs to be noted that machines often take dollars, an issued card, debit cards and/or credit cards.
  
- 2) In Section 22 - DETAIL OF SALES, SHIPMENTS, RECEIPTS, OR REVENUE – Continued
  - a. For description 3., it should read “carnival games” as rides are covered in description 4
  - b. It is suggested that description 6. be split into two: “Other amusement park and arcade rides, and attractions” and “Other games.”
  - c. For description 12.a. add “online” as a media option
  - d. For description 14.b. add an example of other such as wheelchair, strollers, lockers, etc.

**Regional Offices:**

**IAAPA Asia Pacific**  
Hong Kong SAR, China

**IAAPA Europe**  
Brussels, Belgium

**IAAPA Latin America**  
México City, México

**IAAPA North America**  
Orlando, Florida

- e. Description 16 for “Rental of coin-operated amusement machines” is a little confusing. Is this rental of the coin-operated machine to another business or a consumer?

FORM AE-71302

- 1) In Section 19 - Kind of Business or Activity
  - a. There are several descriptions in AE-71303 that overlap with this form. For example, 713 120 001 “Arcade or video game arcade,” 713 120 002 “Family entertainment center...,” and 713 990 80 E “Single amusement attraction...”
    - i. Is it the intention of Census, to have them in both categories knowing they may get the wrong form? If so, is the data combined correctly when reporting the results?
    - ii. It seems less confusing to pull 713 120 001, 713 120 002 and 713 990 80 E from AE-71302 and have them only in AE-71303.
- 2) In Section 22 - DETAIL OF SALES, SHIPMENTS, RECEIPTS, OR REVENUE – Continued
  - a. For description 18., it should read “carnival games” and rides should have its own line.

We would be happy to discuss any of our comments as needed.

Sincerely,



Melissa Teates

[mteates@iaapa.org](mailto:mteates@iaapa.org)

571-210-4326



AMERICAN  
SPEECH-LANGUAGE-  
HEARING  
ASSOCIATION

September 21, 2015

Jack B. Moody  
Assistant Survey Director, Economic Census  
Economy-Wide Statistics Division  
U.S. Census Bureau  
Via email: [ec17assocation@census.gov](mailto:ec17assocation@census.gov)

Dear Dr. Moody,

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 182,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. We appreciate the opportunity to offer comment on the 2017 Economic Census questionnaires.

Audiologists and speech-language pathologists are appropriately reflected in the following Health Care and Social Assistance forms:

HC-62104 Office of Physicians and Other Health Practitioners  
HC-62106 Home Health Care Services  
HC-62108 Other Ambulatory Health Care Services  
HC-62109 Outpatient Care Facilities  
HC-62190 Classification Form - Ambulatory Health Care Services

In the following Health Care and Social Assistance forms, audiologists are appropriately reflected; however, speech-language pathologist(s) are referred to as "speech therapist(s)."

HC-62301 Nursing, Assisted Living, and Residential Care Facilities  
HC-62390 Classification Form - Nursing and Residential Care Facilities  
HC-62402 Services for the Elderly, Disabled, and Intellectually and Developmentally Disabled  
HC-62406 Child Day Care Services  
HC-62490 Classification Form - Social Assistance

"Speech-language pathologist" is the preferred title for these professionals and is the title recognized by the Federal Standard Occupational Classification (29-1127.00). We would like to see the title corrected accordingly in the above five forms.

We believe that the remaining questionnaire content is appropriate, clear, and comprehensive as it relates to the professions of audiology and speech-language pathology. Again, thank you for the opportunity to offer comment.

Sincerely,

Arlene A. Pietranton, PhD, CAE  
Chief Executive Officer

October 30, 2015

Jack B. Moody  
Assistant Survey Director, Economic Census  
Economy-Wide Statistics Division  
U.S. Census Bureau  
4600 Silver Hill Road  
Washington, DC 20233

Mr. Moody,

The American Optometric Association (AOA) represents 33,000 doctors of optometry and optometry students. Doctors of optometry serve patients in nearly 6,500 diverse communities across the country, and in 3,500 of those communities are the only eye doctors. The AOA appreciates the opportunity to provide comments in preparation for the 2017 Economic Census. We feel the changes recommended below are necessary to ensure accuracy and eliminate misinformation.

#### **Form HC-62104 (Office of Physicians and Other Health Practitioners)**

On the current form, page 3, question 19 relates to the kind of business that is conducted at the location. It is common practice to use the term “doctor(s) of optometry” rather than “optometrist(s)” and we recommend this language revision be made. Additionally, the Bureau has doctors of optometry incorrectly categorized as “Other health practitioners” on the current census form. Doctors of optometry are recognized as physicians under the Medicare program<sup>1</sup> and, for consistency throughout the federal agencies, the AOA recommends that doctors of optometry be appropriately listed under “Physician services.” We also recommend that the additional inaccurate language which states, “Include physicians with the degree of M.D. or D.O.” should be removed or the degree of O.D. should be added.

On the current page 5, question 22 needs to be updated to reflect the transition made to ICD-10 on October 1, 2015. On page 5, we also recommend that one entry be added to represent “Diseases of the Eye and Adnexa (H00-H59).” Additionally, on the current page 8, question 26, the term “optometrists” should be replaced with “Doctors of Optometry.”

#### **Form HC-62109 (Outpatient Care Facilities)**

On the current page 4, question 19 and current page 9, question 26, we recommend that the term “optometrists” be replaced with “doctors of optometry.”

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<sup>1</sup> [http://www.ssa.gov/OP\\_Home/ssact/title18/1861.htm#act-1861-r](http://www.ssa.gov/OP_Home/ssact/title18/1861.htm#act-1861-r)

**Form HC-62190 (Classification Form - Ambulatory Health Care Services)**

We recommend for question 19 on pages 3 and 4, “optometrists” should be replaced with “doctors of optometry.” Additionally, for the reasons stated previously, doctors of optometry should be appropriately listed under “Physician services” and we recommend that the additional inaccurate language which states, “Include physicians with the degree of M.D. or D.O.” should be removed or the degree of O.D. should be added.

Thank you for the opportunity to comment on these forms in anticipation of the 2017 census. If you have any questions, please contact Rodney Peele, Associate General Counsel Public Policy at [rpeele@aoa.org](mailto:rpeele@aoa.org)

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Loomis OD'.

Steven Loomis, OD  
President, American Optometric Association

1201 15th Street NW  
Washington, DC 20005

D 202 266 8383  
T 800 368 5242 x8383  
[dcrowe@nahb.org](mailto:dcrowe@nahb.org)



October 29, 2015

Jack B. Moody  
Assistant Survey Director, Economic Census  
Economy-Wide Statistics Division  
U.S. Census Bureau  
Washington, DC 20233-0001

Re: 2017 Economic Census Questionnaires.

Dear Assistant Director Moody:

On behalf of the National Association of Home Builders (NAHB), I would like to thank you for inviting NAHB to comment on the questionnaires for the 2017 Economic Census, and to provide specific comments and recommendations on the questionnaires for two sectors of the U.S. economy.

NAHB is a Washington-based trade association representing more than 140,000 member firms involved in building and remodeling single-family and multifamily housing, land development, operating and managing residential rental properties, and other aspects of residential construction. NAHB and its members are thus frequent users of information from the Economic Census, especially information on the Construction and Real Estate and Rental and Leasing sectors. For this and other reasons, NAHB has been a strong supporter of the Economic Census over the years.

In this letter, NAHB is providing two major sets of recommendations on questionnaires that fall within its field of expertise: 1) questionnaires for the Construction sector (CC-23601 to CC-23804), and 2) the questionnaire for Real Estate Lessors (RE-53160).

**1. Questionnaires for the Construction sector (CC-23601 to CC-23804)**

There are six questionnaires for the construction sector, and all are similar. On page three of each questionnaire, Question 5 Part A asks the construction establishment to report sales, receipts, or revenue for construction work. The footnote to the question asks the establishment to exclude cost of land other than site preparation. This is potentially confusing to small builders and developers with land costs, and it is asking a lot of them to understand the note and appropriately net out these costs.



Home builders that build on owner's or investor's land (NAICS categories 236115 and 236116) do not typically buy land themselves and are therefore likely to report the value of construction work properly in Question 5A. For-sale home builders (NAICS 236117), however, build new homes on land they own and control. When they sell new homes, the land is included with the sale of homes and land costs are reflected in home sale revenues reported on the financial statements. Asking them to exclude cost of land other than site preparation can be confusing, as they may have purchased a developed lot and have no idea what site preparation performed by another establishment costs.

For more than 40 years, NAHB has collected income statement information from single-family builders in its Cost of Doing Business (CODB) surveys. Appropriate income statement line items for the survey are identified in consultation with builders, and with reference to NAHB's official chart of accounts ([www.nahb.org/chart](http://www.nahb.org/chart)). As currently structured, the survey first asks builders to report gross revenue (free of any expense or cost), and then specifically asks for land costs, and direct and indirect construction costs separately. After collecting these data, NAHB subtracts the three categories of cost, to come up with an industry benchmark for gross profit. In our experience, a significant share of builders have difficulty filling out the form accurately; even when each line item is described in detail and specific references to the chart of accounts are provided. We find it difficult to believe that a questionnaire asking builders to interpret a particular type of cost correctly and perform a non-standard calculation themselves could be more accurate.

Establishments that perform land subdivision (NAICS 237210) face similar issues when filling out Form CC-23701. These establishments will generally know the revenue they realize from selling subdivided lots with a fair degree of accuracy, but will virtually never think of this as being net of land acquisition costs.

In short, NAHB believes many construction establishments, especially for-sale home builders and land developers, do not accurately subtract land costs when reporting receipts in Question 5A.

We find evidence that this was in fact the case in the 2012 Economic Census. Using data for the construction sector recently released from this Census, NAHB subtracted costs from the value of construction work done, and labelled the residual profit. The following chart summarizes the results of these calculations.

VALUE OF CONSTRUCTION WORK BREAKDOWN



Source: NAHB calculation of statistics from the 2012 Economic Census

The chart shows a residual profit that seems reasonable and is generally consistent with NAHB’s internal data for new single-family except for-sale builders, residential remodelers, and specialty trade contractors. However, the residual profit for for-sale builders and land subdivision—the establishments that virtually always have substantial land acquisition costs—are unrealistically high. We see no reasonable way to explain these numbers, other than builders and developers sometimes inappropriately including land costs when they report construction receipts in Question 5A.

***Therefore, on the questionnaires for the construction sector in the 2017 Economic Census, NAHB recommends that the Census Bureau 1) eliminate the footnote in Question 5A that asks establishments to exclude costs of land other than site preparation when reporting construction receipts, and 2) add a separate question on land acquisition costs that the Census Bureau may use itself after the data are collected to net out value of construction work done by the establishment.***

**2. Questionnaire for Real Estate Lessors (RE-53160)**

Your letter soliciting input on the questionnaires specifically asks if the terms and definitions used are common for the industry. In that regard, NAHB would like to comment on terms used in Question 19 (Kind of Business) on page 5 of questionnaire RE-5310 (for Real Estate Lessors).

The first two sections of Q19 ask the establishment to identify its principal business activity by checking one of the subcategories under the headings “Lessors of residential properties” or “Lessors of nonresidential properties.”

Jack B. Moody  
U.S. Census Bureau  
October 29, 2015  
Page 4

In the residential real estate industry, the term lessor is seldom used, especially as a means to identify the owner of a property. If owners of multifamily rental properties were to use the term lessor, they would most likely mean by it someone employed by the owner to help lease up the property. In the nonresidential sector, the term lessor is somewhat more common and less confusing, but the term property owner is still more common and easier to understand.

***Therefore, on the questionnaire for real estate lessors in the 2017 Economic Census, NAHB recommends that, in Question 19 (kind of business), the Census Bureau replace the heading “Lessors of residential properties” with “Owners of residential rental properties,” and “Lessors of nonresidential properties” with “Owners of nonresidential rental or leased properties.” Moreover, NAHB recommends that the word “Lessor” be replaced with “Owner” in all subcategories that appear under one of these headings.***

Thank you for the opportunity to comment on this important data collection effort. If you have any questions about NAHB’s comments, please contact Paul Emrath, NAHB’s Vice President of Survey and Housing Policy Research (202-266-8449, [pemrath@nahb.org](mailto:pemrath@nahb.org)).

Best regards,



David Crowe  
Chief Economist



DEPARTMENT OF HEALTH & HUMAN SERVICES  
Centers for Medicare & Medicaid Services  
7500 Security Boulevard, Mail Stop N3-01-21  
Baltimore, Maryland 21207-0512

October 30, 2015

Dear Jack Moody:

Thank you for your invitation to submit comments regarding the content of the 2017 Economic Census Questionnaires. The Economic Census is a critical component of the Nation's statistical system and provides extremely valuable information regarding national, regional, and state level economic activity. The Office of the Actuary relies heavily on the results of the Economic Census as the primary data source used to benchmark estimates of health care spending in the National Health Expenditure Accounts (NHEA) and we are happy to provide the following comments and suggestions for your consideration:

1. In the health sector, purchases of goods and services are largely paid for by third party payers such as private and publically provided health insurance and programs. The composition of these payers by type of good and service is critically important for the development of the NHEA. Recent changes in the way health care is financed and paid for including the impacts of the Affordable Care Act, have made it even more important to have detailed data and information related to the payers and programs that pay for health care. We recommend the addition of the following question to the 2017 Economic Census for forms HC-62104-HC62110, HC-62190,HC-62201,HC-62301,HC-62390, and HC-62402 forms.

Estimate the level of patient care revenue reported in 22, line 1, from:

Medicare  
Medicaid  
DOD  
VA  
CHIP  
Workers Compensation  
Other Government Programs  
Private Health Insurance  
    Medicare Managed Care Plans  
    Medicaid Managed Care Plans  
Property and Casualty Insurance  
Out of Pocket  
Other Sources – please specify

2. We also recommend that the 2017 Economic Census collect information on retail health care clinics that are owned and operated by retail stores and as such are included in the Economic Census in NAICS 44 and 45. This important and rapidly growing segment of the health care industry is difficult to estimate because the establishments providing these health care services are classified in the NAICS as retail and not health care

establishments. Direct collection of these products in the 2017 Economic Census would provide valuable information to supplement the data collected in NAICS 62.

Retail health care clinics are included in several places in the NAICS. Retail health care clinics usually follow one of three models:

- 1) clinics owned by an independent company that operates within a retail store
- 2) clinics owned and operated by the retail store that they are located in
- 3) clinics owned and operated by a hospital, physician group, or other health care provider.<sup>[i]</sup>

Retail clinics that are owned and operated by an independent company whose primary activity is to provide freestanding urgent and clinical care are classified in the health sector and are included in NAICS 621493. Clinics that are owned and operated by other health care providers such as hospitals and physicians groups are also included in the health sector and are classified by the primary activity of the establishment such as NAICS 622 (if the clinic is located in the hospital) or NAICS 6211 (if located in a physician office). However, retail clinics that are owned and operated by a retail store are currently included in NAICS 44 and 45 (Retail trade) and not in the health sector (NAICS 62). These clinics are appropriately classified by the primary activity (retail sales) of the establishment and would be best identified by an expansion of the product level detail for these industries in the Economic Census.

3. On the 2017 Economic Census forms, it's not clear that the preferred reporting period is for the calendar year (January-December). The reporting period is asked for at the end of the form in the certification section. We suggest moving this up to the front of the form and wording it in a way that states that calendar year is preferred. Perhaps something similar to the statement used in the Service Annual Survey "Calendar year data is preferred. If it is not available, please report for the fiscal year that includes at least six months of data for the 2017 calendar year"
4. In section 22 (Detail of sales) for the line "e. All other resale of medical equipment and supplies" we recommend adding a section for the respondent to describe what is being reported in this line.
5. For Question 22 on the Physician and Other Health Practitioners Questionnaire, it would be helpful to request an estimate of "revenue from hospitals". Payments to physicians by hospitals are often reported as physician revenue and paid for out of hospital revenue, and in order to eliminate double counting of this revenue in the NHEA we remove an estimate of this revenue from physician spending. The direct collection of this data in the Economic Census would improve this adjustment.
6. How will the 2017 Economic Census handle bundled payments for health care services that are provided by establishments in different NAICS categories?

Thank you again for the opportunity to comment on content of the 2017 Economic Census questionnaire. If you would like to further discuss any of our comments, suggestion, or questions please don't hesitate to contact me.

Sincerely,

Aaron Catlin  
Deputy Director, National Health Statistics Group  
Office of the Actuary  
Centers for Medicare & Medicaid Services

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November 18, 2015

Jack B. Moody  
U.S. Department of Commerce  
Economics and Statistics Administration  
U.S. Census Bureau  
Washington, D.C. 20233-0001  
Email: [ec17association@census.gov](mailto:ec17association@census.gov)

**Form MC-33613**

The survey questionnaire and instructions use common terms/definitions that are common to the marine manufacturing industry, and it accurately reflects the production occurring in our industry. NMMA does not recommend any changes.

**Form MC-33320**

The survey questionnaire and instructions use common terms/definitions that are common to the marine manufacturing industry, and it accurately reflects the production occurring in our industry. In Section 22, Question 7 could be considered confusing due to the exclusion of marine engines; while marine engines are addressed in Question 12, the explicit exclusion could preclude a recipient from finishing the survey. Perhaps more clarity before Question 6 could be beneficial.

**Form RT-44102**

The survey questionnaire and instructions use common terms/definitions that are common to the marine manufacturing industry, and it accurately reflects the production occurring in our industry. NMMA recommends the department connect with the Marine Retailers Association of the Americas (MRAA), if it has not already done so, to yield more complete feedback on this form.

Sincerely,



Michael Lewan  
Government Relations Manager  
National Marine Manufacturers Association