



United States Department of Agriculture  
National Agricultural Statistics Service



December 20, 2019

National Cotton Council of America,  
National Cotton Ginners Association,  
American Cotton Producers

Dear Mr. Harrison Ashley,

Thank you and your council along with the other members of the National Cotton Ginners Association and the American Cotton Producers for your recent letter in support of the renewal of the Cotton Ginning Survey.

The primary functions of the National Agricultural Statistics Service (NASS) are to prepare and issue State and national estimates of crop and livestock production, disposition, and prices and to collect information on related environmental and economic factors, whole farm characteristics, and operator demographics. Timely, reliable, and detailed statistics help maintain a stable economic atmosphere and reduce risk for production, marketing, and distribution operations. NASS is the primary data collection Agency of the US Dept. of Agriculture.

In your letter you included two recommendations for this survey.

**Recommendation 1:** "We would suggest that the use of 'asterisks' early in the season, or when insufficient number of gins are reporting, be eliminated. The industry is aware of gins that are operating in these states or counties, so to not show their ginning data is a hindrance in creating necessary industry reports. We suggest that NASS report this data or, if necessary, develop a waiver that would allow all data to be reported."

**Reply 1:** Due to NASS Confidentiality Rules we suppress the summarized data when it would reflect an individual operation's data. We can look into the feasibility of getting waivers signed by all participating operations to allow for publication.

**Recommendation 2:** "The ginning industry has had great success in survey participation using electronic reporting and suggests that this be made an option for gins."

**Reply 2:** NASS has had Electronic Data Reporting (EDR) or internet reporting available for the Cotton Ginning surveys for several years. We will work with our Survey Administrators to promote this reporting option to our respondents.

The content of the Cotton Ginning Survey has been developed over the years at the request of numerous data users such as yourselves. NASS is also looking for ways to streamline the questionnaire to reduce respondent burden and data collection costs, while still providing data users with the detailed data they need.

Following the initial 60 day public comment period the complete docket will be submitted to OMB, which will contain the supporting statements, sample questionnaires, samples of publicity materials, and other documents for the public to review for 30 days. After that OMB will be able to begin their review of the docket materials. The materials will be available in the Office of Information and Regulatory Affairs system <https://www.reginfo.gov/public/do/PRAMain>.

The Cotton Ginning Survey is extremely important to our data users. Your comments will be provided as a part of this submission to the Office of Management and Budget.

Please let us know if you have any questions or concerns.

Again, many thanks!

Joseph L. Parsons  
Chair, Agricultural Statistics Board  
U.S. Department of Agriculture  
National Agricultural Statistics Service