**Department of Commerce**

**U.S. Census Bureau**

**OMB Information Collection Request**

**Annual Wholesale Trade Survey**

**OMB Control Number 0607-0195**

#### ****Part A**** – ****Justification****

**Question 1. Necessity of the Information Collection**

The Annual Wholesale Trade Survey (AWTS) covers employer firms with establishments located in the United States and classified in the wholesale trade sector, as defined by the North American Industry Classification System (NAICS). There are two main types of wholesalers in the wholesale trade sector: 1) merchant wholesalers and 2) agents, brokers, and electronic markets. Merchant wholesalers sell goods on their own account. This category includes sales offices and sales branches (except retail stores) maintained by manufacturing, refining, or mining enterprises apart from their plants or mines for the purpose of marketing their products. Agents, brokers, and electronic markets, on the other hand, arrange sales and purchases for others (generally for a commission or fee).

Respondents are further separated into the following three type of operation categories: merchant wholesalers, excluding manufacturers’ sales branches and offices; manufacturers’ sales branches and offices; and agents, brokers, and electronic markets. The firms are instructed to submit their information to the Census Bureau via Centurion, the Census Bureau’s online reporting instrument. (Additional details about the electronic reporting process will be covered in the Use of Information Technology section.) The AWTS requests data on a variety of topics. A firm’s type of operation classification dictates which particular subset of data items it will receive. The table below displays the specific questions for each type of operation category. (An “X” indicates that companies with that particular type of operation classification are asked to provide information on that specific item.)

|  |  |  |  |
| --- | --- | --- | --- |
| **Item** | **Merchant wholesalers, excluding manufacturers’ sales branches and offices (SA-42A)** | **Manufacturers’ sales branches and offices (SA-42A-MSBO)** | **Agents, brokers, and electronic markets (SA-42A-AGBR)** |
| Organizational Change | X | X | X |
| Reporting Period | X | X | X |
| Number of Establishments | X | X | X |
| Annual Sales | X | X | X |
| Annual Sales on Own Account |  |  | X |
| Annual Sales Made on the Account of Others |  |  | X |
| Annual Commissions |  |  | X |
| Annual E-commerce Sales | X | X | X |
| Value of End-of-Year Inventories (Held Inside or Outside of the United States) | X | X |  |
| Inventory Valuation Method | X | X |  |
| Annual Purchases of Products | X |  | X |
| Annual Operating Expenses | X | X | X |

In response to a request from the Bureau of Economic Analysis (BEA), the AWTS will also collect annual detailed operating expenses and annual sales tax information during survey year 2022. Respondents are only asked to provide data for these two items in years ending in “2” and “7”, which coincide with the Economic Census collection. Merchant wholesalers, excluding manufacturers’ sales branches and offices, will receive the detailed operating expenses and sales tax questions. Conversely, manufacturers’ sales branches and offices will only see the sales tax question. Companies that fall under the agents, brokers, and electronic markets category will not be asked to provide detailed operating expenses or sales tax information.

This survey provides an official, continuous measure of wholesale activity in the United States. Government agencies, private businesses, and researchers utilize the estimates generated from the AWTS in a variety of ways, including to conduct market analysis and forecast future demand. The next section, Needs and Uses, provides additional information on the users and uses of the data.

The AWTS introduced a new sample for survey year 2016. In order to link the old sample and new sample estimates, two years of data (2015 and 2016) were collected during the 2016 survey year. Two years of data are only requested during the first year of a new sample. For survey year 2020, the AWTS will continue to use the sample introduced for survey year 2016. Thus, only one year of data will be collected. Respondents will be asked to provide one year of data for all subsequent years until a new sample is selected. A new sample will not be selected during this three-year clearance window.

From survey year 2016 through survey year 2019, there were five electronic form types (SA-42, SA-42A, SA-42A-MSBO, SA-42-AGBR, and SA-42A-AGBR). Starting with survey year 2020 (which will be collected in 2021), there will only be three electronic form types (SA-42A, SA-42A-MSBO, and SA-42A-AGBR). SA-42 and SA-42-AGBR are being removed to streamline data collection operations and reduce respondent burden.

Each year, estimates generated from the AWTS are released to the public approximately 14 months after the reference period has concluded. These national-level estimates are published (for the various items collected) by NAICS code and type of operation. (The current sample was selected on a 2012 NAICS basis, so the estimates are also released on a 2012 NAICS basis. Data will not be published on a 2017 NAICS basis until the next sample revision occurs, which will not take place during this three-year clearance window.) The data are currently disseminated through the [AWTS website](https://www.census.gov/programs-surveys/awts/data/tables.html). In the future, however, the data will be released via the Census Bureau’s dissemination platform, [data.census.gov](https://data.census.gov/cedsci/). The survey year 2020 data products are scheduled to be released through [data.census.gov](https://data.census.gov/cedsci/).

The Census Bureau conducts this survey under the authority of Title 13, United States Code, Sections 131 and 182. Sections 224 and 225 make this survey mandatory (see Attachment 5).

The Census Bureau issued a pre-submission notice that was published in the Federal Register on Wednesday, June 3, 2020 (Vol. 85, No. 107). The notice, which was located on pages 34174 and 34175, stated that the AWTS was considering the addition of questions related to the impact coronavirus disease 2019 (COVID-19) had on firms for survey year 2020. After internal discussions, the Census Bureau decided it will not include COVID-19 questions on the AWTS.

**Question 2. Needs and Uses**

The AWTS serves as a benchmark for the estimates produced from the Census Bureau’s Monthly Wholesale Trade Survey (MWTS) [OMB No. 0607-0190].

Externally, the BEA uses the data to estimate the change in the private inventories component of gross domestic product (GDP) and output in both the benchmark and annual input-output (I-O) accounts and the GDP by industry statistics. This agency also utilizes the sales tax information to prepare estimates of GDP by industry and to derive industry output for the I-O accounts. The data on detailed operating expenses are used to produce national estimates of value added, gross output, and intermediate inputs and serve as a benchmark for the annual industry accounts, which provide the control totals for the GDP by state accounts. (Refer to Attachment 1 for more information regarding BEA’s usage of the AWTS data.)

The Bureau of Labor Statistics (BLS) utilizes the data as an input to its producer price indices and in developing productivity measurements.

As noted in the Necessity of the Information Collection section, other government agencies, researchers, and businesses also use the data for a variety of reasons. For example, private businesses utilize the estimates in computing business activity indices. Additionally, the AWTS data are used to conduct economic market analysis, forecast future demand, and evaluate company performance.

Information quality is an integral part of the pre-dissemination review of the information disseminated by the Census Bureau (fully described in the Census Bureau's Information Quality Guidelines). Information quality is also integral to the information collections conducted by the Census Bureau and is incorporated into the clearance process required by the Paperwork Reduction Act.

**Question 3. Use of Information Technology**

The AWTS respondents are required to submit their data through the Census Bureau’s online reporting system, Centurion. This system is designed to make the reporting process more flexible, secure, and convenient for respondents. The response-driven nature of the instrument also reduces respondent burden. Respondents can complete the entire survey in one session or work on the survey over several sessions. Centurion automatically saves the entered data when the user proceeds to the next screen, so the users can return later and pick up exactly where they previously left off. The data provided electronically by respondents are immediately available to the Census Bureau.

The initial letter to respondents identifies the survey name, due date, instructions for accessing the survey, authority for collection, and burden estimate. It also provides a telephone number for those needing assistance. The initial and follow-up mailings instruct respondents to access the Census Bureau’s Respondent Portal (<https://portal.census.gov>). The Census Bureau will also periodically send an e-mail reminder, or eBlast, to respondents. These e-mail reminders provide the same instructions. A telephone follow-up is scheduled for nonrespondents as well. Once the user arrives at <https://portal.census.gov>, the individual will create a new account (i.e., register) or sign in to an existing account. The Respondent Portal allows users to add and view all current Census Bureau surveys assigned to them. Using the Respondent Portal, respondents can access Centurion (by clicking “Report Now” for the appropriate survey), view their filing status, request extensions, and securely communicate with the Census Bureau.

Once the user logs in to Centurion via the Respondent Portal, the respondent can view PDF worksheets listing all of the questions he or she will be asked to answer. This enables the individual to compile answers to the questions before beginning the electronic reporting process (if desired). Respondents are asked to make note of any special instructions listed either on the main menu or on their worksheet.

The nightly loading of electronic responses allows for a more timely identification of completed questionnaires, which reduces the number of unnecessary follow-up reminders respondents receive.

For the AWTS, electronic reporting is the only advertised reporting option. Nevertheless, the Census Bureau will accept data submitted through other methods. For example, if a company does not have access to the Internet, the Census Bureau can arrange for the business to provide its data to an analyst via telephone.

The table below lists the percentages of submitted questionnaires that were completed via the Internet (Centurion) for the current sample.

|  |  |  |  |
| --- | --- | --- | --- |
| **20191** | **2018** | **2017** | **2016** |
| 98.8% | 97.5% | 96.6% | 97.3% |

1As of 8/4/20

**Question 4. Efforts to Identify Duplication**

Research with other government agencies, trade associations, and government and private sector data users (via telephone conversations, meetings, trade journal articles, and written correspondence) indicates the AWTS data are not available from other sources on an ongoing basis.

Monthly sales and inventories data are collected in the MWTS (OMB No. 0607-0190). However, this monthly survey is voluntary and requests sales and end-of-month inventories data from a smaller sample of firms. The mandatory AWTS, which occurs on an annual basis, collects more detailed items. It serves as a benchmark for the monthly sales and end-of-month inventories estimates. The annual program is also intended to provide wholesale trade estimates in the period between Economic Census collections, which take place in years ending in “2” and “7”.

**Question 5. Minimizing Burden**

The Census Bureau attempts to minimize burden by using a stratified simple random sample design, which uses the least number of sampling units required to produce national-level estimates with the desired level of reliability. Data are collected from the largest firms and from a sample of small- and medium-sized firms. The effective sampling rate for the small- and medium-sized firms is approximately 2% of the universe.

As previously noted, the Centurion reporting instrument is response-driven, which reduces overall burden. Likewise, the removal of SA-42 and SA-42-AGBR will decrease respondent burden. (Only SA-42 and SA-42-AGBR asked respondents about their payroll employer identification number, so the companies previously receiving SA-42 and SA-42-AGBR will now receive one less question during this three-year clearance window.)

**Question 6. Consequences of Less Frequent Collection**

Less frequent data collection would significantly impact the MWTS, a key economic indicator. Specifically, the MWTS sales and end-of-month inventories estimates are benchmarked to the AWTS estimates. If the AWTS estimates were not available as often as they currently are, this would decrease the accuracy of the MWTS data. A reduction in the frequency of the AWTS would also yield a decrease in the accuracy of the GDP estimates, because the BEA uses the AWTS data when producing the GDP estimates.

**Question 7. Special Circumstances**

There are no special circumstances.

**Question 8. Consultations Outside the Agency**

The Census Bureau issued a pre-submission notice that was published in the Federal Register on Wednesday, June 3, 2020 (Vol. 85, No. 107). The notice is located on pages 34174 and 34175. In response to the notice, the Census Bureau received a letter of support from the BEA (see Attachment 1). The Census Bureau thanks the BEA for its continued support of this collection.

In addition to the letter of support from the BEA, the Census Bureau received comments from one individual. The commenter noted that some businesses find the published data useful for things like identifying market share and analyzing new business opportunities. However, the person expressed concerns that some respondents, particularly smaller businesses, may find the AWTS burdensome and not benefit from the estimates produced from the survey. The commenter called into question the overall value of the survey. The individual also expressed concerns that the sampling procedures used for the AWTS may not produce accurate information. Finally, the person made three recommendations: consider abolishing the AWTS, respond to improved approaches to data collection, and ensure that the data extracted from the survey are relevant to current business practices.

As the commenter mentioned, businesses use the AWTS data for a variety of reasons, including to compute business activity indices, conduct economic market analysis, forecast future demand, and evaluate company performance. The Census Bureau publishes the estimates generated from the survey on an annual basis. All individuals, businesses (including all respondents), and organizations have free access to the data. Businesses are not the only users of the AWTS data. The AWTS serves as a benchmark for the MWTS estimates. The BEA employs the data in a number of ways, including to estimate the change in the private inventories component of GDP. Another government agency, the BLS, uses the data as an input to its producer price indices and in developing productivity measurements. The Needs and Uses section provides additional details about the users and uses of the AWTS data. As mentioned in the Efforts to Identify Duplication section, research with other government agencies, trade associations, and government and private sector data users indicates the AWTS data are not available from other sources on an ongoing basis. External parties are also consulted to ensure the Census Bureau’s surveys are collecting information relevant in today's economy.

The Census Bureau makes every effort to minimize the burden on all respondents. The agency evaluates the necessity of each item collected via the survey by interacting with stakeholders. Centurion, the electronic reporting instrument, is response-driven, which reduces burden by only showing applicable questions to the respondent. The usage of an electronic reporting system with a response-driven design demonstrates the Census Bureau's continued commitment to making the data collection process as easy and reliable as possible. Each year, the survey staff evaluates the design of the reporting instrument and looks for general improvements that can be made in the data collection process. This ensures the data collection minimizes respondent burden as much as possible but still enables the agency to capture accurate information. The Census Bureau also accepts estimates from companies when book figures are not readily available.

Revising the sample approximately every five to seven years also reduces burden. As discussed in Part B (Universe and Respondent Selection section), noncertainty firms from the previous sample are placed in a nonselection category for the new sample if their exclusion would not bias the sample. Overall, the effective sampling rate for the small- and medium-sized firms is approximately 2% of the universe. The Census Bureau staff continuously evaluates the methodological procedures employed for the AWTS to make sure they are producing reliable and useful information in a way that minimizes burden on respondents. Part B provides additional information regarding the methodology behind the AWTS, including sampling and benchmarking processes.

During 2018, a National Academy of Sciences (NAS) panel issued [recommendations](https://www.nap.edu/catalog/25098/reengineering-the-census-bureaus-annual-economic-surveys) for the Census Bureau’s annual economic surveys. The Census Bureau is using these suggestions to improve its surveys. (This project was sponsored by the Census Bureau, which asked the Committee on National Statistics to convene a panel to review the Census Bureau’s portfolio of annual economic surveys.)

Because the AWTS will continue to use the same sample of businesses and request essentially the same information during this three-year clearance window, new research was not conducted with respondents to investigate recordkeeping practices, ease of reporting, etc.

**Question 9. Paying Respondents**

The AWTS does not provide any payments or gifts to respondents.

**Question 10. Assurance of Confidentiality**

The initial letter (see Attachment 2), welcome screen in the electronic reporting instrument (see Attachment 3), and respondent worksheets (see Attachment 4) convey the specific laws that authorize the collection, require response to the survey, and ensure the confidentiality of those submitting information. Specifically, the following block of text is displayed:

*Title 13, United States Code, Sections 131 and 182, authorizes this collection. Sections 224 and 225 require your response. The U.S. Census Bureau is required by Section 9 of the same law to keep your information confidential and can use your responses only to produce statistics. The Census Bureau is not permitted to publicly release your responses in a way that could identify your business, organization, or institution. Per the Federal Cybersecurity Enhancement Act of 2015, your data are protected from cybersecurity risks through screening of the systems that transmit your data.*

The AWTS website (i.e., the [Information for Respondents](https://www.census.gov/programs-surveys/awts/information.html) and [FAQs](https://www.census.gov/programs-surveys/awts/about/faq.html) pages) relays similar information to respondents.

Note: For Attachment 2, AWTS-L1, ODYS-WS-L1, ODYS-RW-L1, and ODYS-RWS-L1 are the initial letters the respondents receive. During 2018, a NAS panel issued [recommendations](https://www.nap.edu/catalog/25098/reengineering-the-census-bureaus-annual-economic-surveys) for the Census Bureau’s annual economic surveys. The Census Bureau is using these suggestions to improve its surveys. (This effort has been named Odyssey.) Because of the recommendations, during the 2019 survey year, the Census Bureau started coordinating data collection efforts between the AWTS, Annual Retail Trade Survey (ARTS), and Service Annual Survey (SAS). Specifically, if a company was required to submit the AWTS and at least one of these other surveys, the agency identified a single point of contact for the company and sent the individual a letter mentioning each survey that needed to be submitted. (A select group of companies were excluded from this coordinated collection effort and continued to be contacted separately by the relevant surveys. Some of these companies were removed from the coordinated collection efforts prior to the initial mailing based on previous collection experiences and communications with the companies. Other companies reached out to the Census Bureau and asked to be removed at later points in time.) Depending on the surveys the company was selected for, it received either ODYS-WS-L1, ODYS-RW-L1, or ODYS-RWS-L1. If a company was only required to complete the AWTS, it simply received AWTS-L1. Follow-up attempts were also coordinated in a similar fashion. During the next three years, the AWTS will be following a similar outreach approach. Consequently, there are a variety of follow-up messages a respondent may receive. Attachment 2 provides a sample of some of these. The exact wording for the initial and follow-up messages has not been finalized yet, but the final versions should be very similar to the samples. Similarly, the electronic reporting instrument for survey year 2020 is still in the development phase, but the information presented in Attachment 3 should be nearly identical to the information displayed in the final instrument.

**Question 11. Justification for Sensitive Questions**

The AWTS does not ask sensitive questions.

**Question 12. Estimate of Hour Burden**

The estimated respondent burden is dramatically higher in survey year 2022 than in 2020 and 2021, because the AWTS will collect detailed operating expenses and sales tax information in survey year 2022. These two items are only collected in years ending in “2” and “7”. It should also be noted that the estimated respondent burden hours for this annual collection will change over time as sample maintenance activities are performed (refer to the Universe and Respondent Selection section in Part B). Namely, the quarterly birth/death process, removal of out-of-scope cases, and restructuring of reporting units to account for organizational changes (e.g., mergers, acquisitions, etc.) will inevitably cause the number of respondents to fluctuate over time. Historically, the number of respondents typically decreases each year within a given sample. This trend has held true for this sample so far (survey years 2016, 2017, 2018, and 2019). Nevertheless, to simplify things, the estimates provided in this section assume that the number of respondents will remain constant for survey years 2020, 2021, and 2022.

The estimated number of respondents used (7,743) represents the actual number of respondents as of April 29, 2020. (This is the date the burden estimate calculations were computed.) Starting in survey year 2020, companies that previously received SA-42 will receive SA-42A, and businesses that were receiving SA-42-AGBR will receive SA-42A-AGBR. The breakdown of the number of respondents by form accounts for these changes. The estimated time to complete each form varies due to the differences in content collected on each (as outlined in the Necessity of the Information Collection section). For the previous three-year clearance window (survey years 2017, 2018, and 2019), the estimates for average burden per response were based on cognitive testing of the questionnaires with a sample of potential respondents. Because the same sample is still being used and the questionnaires have only slightly changed, the same estimates for average burden per response are listed in the table below (in the Hours column). For survey years 2020 and 2021, the estimated total annual burden hours are 4,204 hours (for each year). Conversely, for survey year 2022, the estimated total annual burden hours is 21,130 hours. For survey years 2020 and 2021, the estimated total annual cost to respondents is approximately $144,618 (for each year). For survey year 2022, the estimated total annual cost to respondents is roughly $726,873. These cost estimates are determined using the 2019 hourly median pay ($34.40) for accountants and auditors from the [BLS](https://www.bls.gov/ooh/business-and-financial/accountants-and-auditors.htm#tab-1).

**Survey Years 2020 and 2021**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Form** | **Number of Respondents** | **Hours** | **Burden (in hours, Number of Respondents X Hours)** | **Cost (in dollars, Burden X $34.40)** |
| SA-42A | 6,269 | 0.55 | 3,448 | 118,611 |
| SA-42A-MSBO | 926 | 0.55 | 509 | 17,510 |
| SA-42A-AGBR | 548 | 0.45 | 247 | 8,497 |
| ***TOTAL*** | ***7,743*** | ***NA*** | ***4,204*** | ***144,618*** |

**Survey Year 2022**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Form** | **Number of Respondents** | **Hours** | **Burden (in hours, Number of Respondents X Hours)** | **Cost (in dollars, Burden X $34.40)** |
| SA-42A | 6,269 | 3.25 | 20,374 | 700,866 |
| SA-42A-MSBO | 926 | 0.55 | 509 | 17,510 |
| SA-42A-AGBR | 548 | 0.45 | 247 | 8,497 |
| ***TOTAL*** | ***7,743*** | ***NA*** | ***21,130*** | ***726,873*** |

***NA = Not applicable***

The three-year average for burden hours is 9,846 hours. The three-year average cost is $338,703.

Note: The figures listed above differ from those presented in the pre-submission notice that was published in the Federal Register on Wednesday, June 3, 2020 (Vol. 85, No. 107). This difference is due to a refinement of the estimates.

**Question 13. Estimate of Cost Burden**

The Census Bureau does not expect respondents to incur any costs other than that of their time to respond. The information requested is of the type and scope normally carried in company records and no special hardware or accounting software or system is necessary to provide answers to this information collection. Therefore, respondents are not expected to incur any capital and start‑up costs or system maintenance costs in responding. Furthermore, purchasing of outside accounting or information collection services, if performed by the respondent, is part of usual and customary business practices and not specifically required for this information collection.

**Question 14. Cost to Federal Government**

The total cost to the Federal Government for the AWTS in fiscal year 2021 is expected to be $1.9 million (all borne by the Census Bureau). This includes expenses for data collection, data processing, data review, publication, equipment, overhead, and support staff. For fiscal years 2022 and 2023, the total cost per year is expected to be comparable to the fiscal year 2021 level.

**Question 15. Reason for Change in Burden**

The current OMB inventory value for total annual burden hours is 4,586. As mentioned in the Estimate of Hour Burden section, the three-year average for this request is 9,846 hours. This increase of 5,260 hours is the result of the variability of the items presented in the questionnaires across survey years. Specifically, as outlined in the Necessity of the Information Collection section, the AWTS will collect detailed operating expenses and sales tax information in survey year 2022. (These items are only collected in survey years ending in “2” and “7”.)

**Question 16. Project Schedule**

The initial letter informing respondents about the survey is sent during the middle of January (i.e., the January after the reference year has concluded). For survey year 2020, these letters are tentatively scheduled to be mailed on January 14, 2021. Centurion, the online reporting instrument, becomes available to the respondents at the same point in time. Respondents always have at least 30 days to complete the survey online, so the due date typically falls towards the end of February. The provisional due date for survey year 2020 is February 23, 2021. Prior to the due date, the agency will send a reminder notification (mailed letter and e-mail) to companies that have not submitted their data yet. If respondents do not submit their data by the due date, the agency continues to remind respondents about the AWTS through various means (e-mails, mailed letters, and/or telephone calls) until they submit the data. Throughout the processing cycle, analysts review the information provided by companies for accuracy. On occasion, they will contact respondents via secure electronic messages (sent through the Census Bureau’s Respondent Portal) or telephone calls to confirm suspicious data. During the fall (around October), the reporting instrument (Centurion) is shut down for the survey year. For survey year 2020, this is currently scheduled to occur on September 30, 2021. Once Centurion has closed, respondents can still provide data to analysts over the telephone. Around late November, after months of analysis, the company- and industry-level data are finalized for the year. Once the data are finalized, the Census Bureau prepares the publication tables. These tables are then reviewed to ensure disclosure avoidance practices have been implemented correctly. The estimates generated from the AWTS are released to the public approximately 14 months after the reference year has concluded. For survey year 2020, the goal is to release the data by the end of January. These national-level estimates are published (for the various items collected) by NAICS code and type of operation. Currently, the data are disseminated through the [AWTS website](https://www.census.gov/programs-surveys/awts/data/tables.html). In the future, however, the data will be released via the Census Bureau’s dissemination platform, [data.census.gov](https://data.census.gov/cedsci/). The survey year 2020 data products are scheduled to be released through [data.census.gov](https://data.census.gov/cedsci/).

As mentioned in the Assurance of Confidentiality section, during 2018, a NAS panel issued [recommendations](https://www.nap.edu/catalog/25098/reengineering-the-census-bureaus-annual-economic-surveys) for the Census Bureau’s annual economic surveys. Because of the recommendations, during the 2019 survey year, the Census Bureau started coordinating data collection efforts between the AWTS, ARTS, and SAS. Specifically, if a company was required to submit the AWTS and at least one of these other surveys, the agency identified a single point of contact for the company and sent the individual a letter mentioning each survey that needed to be submitted. (A select group of companies were excluded from this coordinated collection effort and continued to be contacted separately by the relevant surveys. Some of these companies were removed from the coordinated collection efforts prior to the initial mailing based on previous collection experiences and communications with the companies. Other companies reached out to the Census Bureau and asked to be removed at later points in time.) Companies that fall under this category are known as “Odyssey companies.” This coordinated effort will continue during this three-year clearance window. The Odyssey companies do not follow the exact same collection schedule as the non-Odyssey AWTS cases (which were previously discussed). The initial letter will likely not be sent at the same time as the one produced for the non-Odyssey cases. Since respondents still receive at least 30 days to submit their data, the due date for these companies will also probably be different. As of now, it is expected that the due date for the AWTS Odyssey companies will be no later than the end of March. However, this is subject to change. (This means the due date reminder will likely be sent at a different point in time, too.) If Odyssey respondents do not submit their data by the due date, the agency will also continue to remind them about their reporting obligations through various means (e-mails, mailed letters, and/or telephone calls) until they submit the data. Odyssey respondents use the same reporting instrument as the non-Odyssey cases. For example, for an Odyssey company that is required to complete the AWTS and the ARTS, the company will complete the AWTS using the AWTS Centurion instrument. It will then complete the ARTS via the ARTS Centurion instrument. Hence, the AWTS reporting instrument will close on the same day for both Odyssey and non-Odyssey respondents. The Odyssey companies are analyzed, tabulated, and published with the non-Odyssey companies.

**Question 17. Request to Not Display Expiration Date**

The AWTS will continue to display the expiration date within the online collection system (Centurion).

**Question 18. Exceptions to the Certification**

There are no exceptions to the certification statement on OMB Form 83-I.

**Question 19. NAICS Codes Affected**

The following are the 4-digit NAICS codes for the wholesalers affected by this information collection:

|  |  |
| --- | --- |
| **NAICS Code** | **Kind of Business Description** |
| 4231 | Motor Vehicles and Motor Vehicle Parts and Supplies |
| 4232 | Furniture and Home Furnishings |
| 4233 | Lumber and Other Construction Materials |
| 4234 | Professional and Commercial Equipment and Supplies |
| 4235 | Metals and Minerals, Except Petroleum |
| 4236 | Household Appliances and Electrical and Electronic Goods |
| 4237 | Hardware, and Plumbing and Heating Equipment and Supplies |
| 4238 | Machinery, Equipment, and Supplies |
| 4239 | Miscellaneous Durable Goods |
| 4241 | Paper and Paper Products |
| 4242 | Drugs and Druggists’ Sundries |
| 4243 | Apparel, Piece Goods, and Notions |
| 4244 | Groceries and Related Products |
| 4245 | Farm Product Raw Materials |
| 4246 | Chemical and Allied Products |
| 4247 | Petroleum and Petroleum Products |
| 4248 | Beer, Wine, and Distilled Alcoholic Beverages |
| 4249 | Miscellaneous Nondurable Goods |
| 4251 | Wholesale Electronic Markets and Agents and Brokers |