

**Attachment H**

**Department of Commerce  
United States Census Bureau  
OMB Information Collection Request  
2022 Economic Census  
OMB Control Number 0607-0998**

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

**Shirley Wodynski <Shirley.Wodynski@cisca.org>**

Thu 6/25/2020 2:47 PM

To: ECON Content

Comments for Section 28:

Best thing we can request for Section 28 is:

CC-23830

What % of your revenue is attributed to ceiling installations?

Do you believe that your buildings are being designed with adequate detailing for sound control?

CC-23810

What % of your revenue is attributed to prefabrication?

What do you project for % prefabrication revenue in the next 10 years

Shirley Wodynski

Executive Director

Ceilings and Interior Systems Construction Association

1010 Jorie Blvd, Suite 30

Oak Brook, IL 60523

630-313-6750

Fax: 866-560-8537

[shirley.wodynski@cisca.org](mailto:shirley.wodynski@cisca.org)

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**Robert Roche <RRoche@ctia.org>**

Tue 6/30/2020 9:58 AM

To: ECON Content

This response is on behalf of CTIA, formerly known as the “Cellular Telecommunications Industry Association,” with respect to the concepts and questions to be included on the 2022 Economic Census. The response I am providing is for the wireless industry, otherwise denominated as “Cellular and Other Wireless Telecommunications (Consolidated),” characterized as IN-5171A.

In particular, I examined the applicability of Item 28, Special Inquiries. I deemed the questions posed therein to be generally appropriate and applicable. However, I did note that on pages 19-23, of the 2017 Economic Census form, below CFN: the form indicated in bold: **ITEM 28: SPECIAL INQUIRIES – PERCENTAGE OF RECEIPTS FOR WIRED TELECOMMUNICATIONS CARRIERS.**

In fact, at least three of the four questions posed on page 19 would also generally apply to **wireless** carriers: with respect to providing (1) broadband internet access, (2) internet telephone service (VoIP) and (3) access to over-the-top / streaming media service. The fourth question – as to providing “multichannel programming distribution services – video and cable television” – would also apply *to at least some* wireless providers, which provide either (a) access to bundled video services, or (b) access to third-party video content providers’ services, in bundled or unbundled form.

I believe that the questions on pages 20-23 would also then be applicable to **wireless** providers, and therefore the bolded subhead noted above, should be revised to read “**PERCENTAGE OF RECEIPTS FOR WIRELESS TELECOMMUNICATIONS CARRIERS.**” for this form.

I would deem the remainder of the questions appropriate for the industry.

Having reviewed the output specific to the wireless industry, I likewise deem the questions and aggregate responses to be appropriate, in terms of developing data that is representative of the industry’s performance.

Thank you. Please do not hesitate to let me know if you have any other questions.

Bob Roche

Robert F. Roche, Ph.D.  
Vice President, Research  
1400 16<sup>th</sup> Street NW  
Washington, DC 20036  
202.736.3255 (office)  
202.674.1713 (mobile)



**Nick Rigitano <NRigitano@nsga.org>**

Tue 7/7/2020 9:04 AM

To: ECON Content

Hi,

Thank you for reaching out to the National Sporting Goods Association. Please find our comments and responses to your questions in the attached word document.

Feel free to contact me with any additional questions/follow-ups. Thanks.

Best Regards,

Nick Rigitano, Director of Insights and Analysis  
**National Sporting Goods Association**  
3041 Woodcreek Drive, Suite 210 | Downers Grove, IL 60515  
(847) 296-NSGA (6742), ext. 1080 | F: (847) 391-9827  
[nsga.org](http://nsga.org)

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NSGA Headquarters is closed until further notice. All NSGA Staff will be working remotely and will be available to answer any questions or concerns you may have by calling (847) 296-6742 or at [info@nsga.org](mailto:info@nsga.org).

July 7, 2020

US Census Bureau

To whom it may concern,

Please see the below responses from the National Sporting Goods Association regarding the 2022 Economic Census Questionnaire:

- Do the survey questionnaires and instructions use terms/definitions that are common for your industry? Yes
- Do the survey questionnaires accurately reflect what is occurring in your industry? Yes
- What do your data users need that we are not asking? Sales per square foot of retail space, sales per employee, percentage of sales that come from an online website.
- What questions are no longer relevant and could be eliminated? None
- Are certain questions difficult to complete? Why? Item 22 due to length of the question and list of possible answers.
- Are instructions clear and helpful? Yes
- Are there any other comments or opinions with regard to your industry?

It would be best for the sporting goods industry if the Sporting Goods Stores segment would remain separated from the Hobby, Musical Instrument, and Book Stores segment. Having Sporting Goods Stores reported in aggregate with the other store categories does not give sporting goods retailers a clear picture of what is happening in their segment on a monthly basis in the advance monthly sales retail trade report. By the time the monthly retail trade report is available, the data is less useful given it is 1.5 months old at that point.

The industry also needs the data from the Economic Census to be released earlier than 4 years after the study is conducted. The full results for the sporting goods industry from the 2017 survey won't be released until the end of 2021. Given how quickly the state of retail is changing in recent history, the data loses value to the industry when it is 4 years old by the time it is released.

The industry also needs breakouts for the store types included in item 17 of the survey (i.e. bicycle shop, golf specialty, gun shop, fishing tackle, ski/snowboard shop, etc.) to be released. I believe these categories were included prior to the 2012 Economic Census, and we are not sure why they were stopped. Each of these categories are

specialized and the businesses selling these categories are very different from one another. The leaders of these businesses do not believe they are in competition with other categories outside their specialty.

Also for item 17 of the survey, we would like to see Ice hockey dealer (retailer or pro shop) added to the list of establishments. There are numerous establishments throughout the country that fall into this category where ice hockey is their principal line of business.

Best Regards,

Nick Rigitano  
Director of Insights and Analysis  
National Sporting Goods Association  
847-296-6742 x1080  
[nrigitano@nsga.org](mailto:nrigitano@nsga.org)

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*Serving the sporting goods industry since 1929*

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## 2022 Economic Census Comments for MC-32732 Concrete Block and Brick Manufacturing



**Robert Thomas** <[rthomas@ncma.org](mailto:rthomas@ncma.org)>

Wed 7/15/2020 9:49 AM

To: ECON Content

Thank you for the opportunity to comment. My comments are specifically addressing MC-32732 Concrete Block and Brick Manufacturing

The title could be reconsidered for the following reasons:

- “Brick” is a term that typically refers to products made from fired clay. There is another category for this product: MC-32711 Building Material and Refractories. But, because that other category does not include Brick in the title, you may get brick manufacturing companies incorrectly classifying themselves in MC-32732
- The term “Concrete Brick” is still relevant, although manufacturing and sales in this category is far less than that of Clay Brick. The title of this category separates the terms “concrete” and “brick” – it might be better to call it “Concrete Block and Concrete Brick” to avoid confusion.
- But – there are other concrete products in this category whose sales and relevance dwarf that of Concrete Brick, such as concrete pavers, segmental retaining wall units, and other concrete masonry veneer units.
- The term “hardscape products” has evolved to represent landscaping products used to outdoor living spaces – and this segment has grown tremendously in the past 30 years.
- The term “concrete masonry” might be a better and broader term for the title that “concrete block”. The industry uses the term CMU – concrete masonry unit. Concrete Masonry would also encompass products such as concrete brick and concrete masonry veneer units.

Therefore, a suggested revised term for this category: “Concrete Masonry and Hardscape Product Manufacturing”

Page 30 dealing with product codes is a little outdated given the evolution of the industry. This category for Concrete Block and Brick Manufacturing targets those manufacturers making primarily dry-cast concrete products. There are two associations that represent these products on the national level: the National Concrete Masonry Association and the Interlocking Concrete Pavement Institute. The products that we would consider as relevant in our industry include:

1. Concrete Block, Structural
  - a. Gray Block
  - b. Architectural Block (integrally colored block, split block, burnished block, ground-faced block, glazed block, etc)
2. Concrete Masonry Units, Non-structural
  - a. Concrete masonry veneer units, architectural
  - b. Concrete Brick
3. Concrete paving units
  - a. Interlocking concrete pavers
  - b. Concrete slabs and patio stones
  - c. Articulated concrete block, ACB (used for revetments and erosion control)
4. Segmental retaining wall, SRW, units

The terms lightweight, medium weight, and normal weight units are still relevant – but primarily only for the Gray Block category above.

The terms screen block, slump block, and shadow wall block are marginally relevant today. Those could be included in the list of architectural block.

Of those “other sales, shipments, receipts, or revenues from this establishment,” I would expect that only two of them would be relevant to these types of establishments:

#10 – quarrying of sand and gravel – but I would add in “for the purposes of manufacturing” in addition to for the purpose of construction.

#11 – Wholesaling services for concrete, cement, sand, gravel, stone, brick, block, and tile

I would recommend removal of #7 (mining fire clay), #8 (mining clay and shale), and #9 (mining gypsum) – but you can check past submissions to see how frequently those are listed.

However, there are a number of new services that these manufacturing facilities have been adding:

- Retail sales to the public for hardscape products (concrete pavers, concrete slabs and patio stones, segmental retaining wall units, stone, tile, etc.)
- Retail sales to contractors for installation of concrete products (construction tools, supplies, mortar, sand, etc.)

Also – some of these manufacturing facilities may also manufacture other forms of concrete that have their own designations:

- MC-32731 Ready-Mix Concrete
- MC-32734 Other Concrete Product Manufacturing

There is obviously a great deal of consistency between all of the concrete manufacturing subsections. I have restricted my comments to those relevant to that subsection most relevant to the industry that our organization represents. However, I would be happy to support a discussion with those organizations representing other concrete sections if desired.

Please feel free to contact me about any of the comments above. Thank you again for the opportunity to comment.

---

Bob Thomas, President  
National Concrete Masonry Association  
Office, Main: 703-713-1900  
Office, Direct: 571-224-0920  
Mobile: 571-201-3456  
[rthomas@ncma.org](mailto:rthomas@ncma.org)



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## 2022 Economic Census input



**Chris Runyan** <[outlook\\_C30B5D5078B27832@outlook.com](mailto:outlook_C30B5D5078B27832@outlook.com)>

Wed 7/15/2020 2:20 PM

To: ECON Content

There does not appear to be a selection for trade association. The survey for construction is targeted to actual construction companies and not the trade associations who represent them. Therefore, I have no comments.

Sent from [Mail](#) for Windows 10

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**hielscher74@gmail.com**

Wed 7/15/2020 1:33 PM

To: ECON Content

I am no longer associated with MCA. I forwarded this to the association.

Metal Construction Association (MCA)  
Karl Hielscher:

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**From: Carolyn Schnare** <[cschnare@convenience.org](mailto:cschnare@convenience.org)>

**Sent:** Thursday, July 16, 2020 2:58 PM

**To:** Charles F Brady (CENSUS/EMD FED) <[Charles.F.Brady@census.gov](mailto:Charles.F.Brady@census.gov)>

**Subject:** FW: FEEDBACK REQUESTED: 2022 Economic Census Questionnaire Content [P24966451922]

Hi Chuck,

Jeff and I went through each of the convenience store surveys (c-store and c-store with gasoline).

Is it ok if I share them with you directly rather than through the email below?

I made comments in each of the attached PDFs.

And, I had some questions/observations:

- It's hard to compare the sale of goods items on the two surveys on a computer, even with two monitors, but they seem fairly different in the retail goods for sale sections. I don't think they should

differ as much as they do, except for the fuel questions. I think of companies that will be doing hundreds of these surveys who have some store in each category (with and without gas) and it would be confusing.

- I would think the c-store questions about food/drink should be the same for both (they are not).
- Also, consider eliminating all the clothing and construction questions on the plain c-store w/o gas survey).

Happy to jump on the phone and I'm fine if you send this off to others that work on the surveys. I think I answered most of the questions below within the surveys.

Thank you for the opportunity! Its really interesting to see these!

Best,  
Carolyn

## 2017 Economic Census RT-44512 - Convenience Stores

Item 17: Principal Business or Activity

EIN:  
Store / Plant:  
CFN:

### ITEM 17: PRINCIPAL BUSINESS OR ACTIVITY

Which ONE of the following best describes this establishment's principal kind of business or activity in 2017?  
If none of the provided selections seem appropriate, provide a specific description of the primary business activity.  
**Select only ONE.**

445120 001	<input type="radio"/>	Convenience food store
447110 002	<input type="radio"/>	Convenience store selling gasoline
445110 001	<input type="radio"/>	Grocery store

### ITEM 17: PRINCIPAL BUSINESS OR ACTIVITY

Which ONE of the following best describes this establishment's principal kind of business or activity in 2017?  
If none of the provided selections seem appropriate, provide a specific description of the primary business activity.  
**Select only ONE.**

445120 001	<input type="radio"/>	Convenience food store
447110 002	<input type="radio"/>	Convenience store selling gasoline
445110 001	<input type="radio"/>	Grocery store

### ITEM 17: PRINCIPAL BUSINESS OR ACTIVITY

Which ONE of the following best describes this establishment's principal kind of business or activity in 2017?  
If none of the provided selections seem appropriate, provide a specific description of the primary business activity.  
**Select only ONE.**

445120 001	<input type="radio"/>	Convenience food store
447110 002	<input type="radio"/>	Convenience store selling gasoline
445110 001	<input type="radio"/>	Grocery store
445110 003	<input type="radio"/>	Food supermarket

Do Not Mail - Report Online

cschnare

Reply

consider adding items from the convenience store with gas station items here such as car wash, automotive repair, etc.

7/6/2020 12:33 PM

cschnare

Reply

If they're answering the c-store survey and they check gasoline, then they should be answering the other survey. Maybe add an asterick that kicks them to the other survey?

cschnare

Reply

what is the difference between grocery store and food supermarket? Also, then they should likely answer the other survey that is relevant to that segment.

7/6/2020 12:13 PM



RT-44512 - Convenience Stores

You must - Report Online

Item 20: Class of Customer

EIN:  
Store / Plant:  
CFN:

ITEM 20: CLASS OF CUSTOMER

A. As a general business practice, did this establishment sell to household consumers and individual users in 2017?

- Yes
- No

B. Were 75% or more of this establishment's sales to retailers/wholesalers/distributors for resale in 2017?

- Yes
- No

C. Did this establishment require proof of business or professional license from new customers in 2017?

- Yes
- No

D. What was the estimated percentage of this establishment's total sales by class of customer in 2017?

1. Household consumers and individuals

**cschnare** [Reply](#)

What does "by class of customer" mean?  
Could it be deleted?

7/16/2020 2:40 PM

2017 Economic Census

RT-44512 - Convenience Stores


Item 22: Detail of Sales, Shipments, Receipts, or Revenue

EIN:  
Store / Plant:  
CFN:

ITEM 22: DETAIL OF SALES, SHIPMENTS, RECEIPTS, OR REVENUE

Of the \$,000.00 of Sales, Shipments, Receipts, or Revenue reported in Item 5, what products and services were included?  
**Select ALL that apply.**

Description	Select	Product Code
-------------	--------	--------------

28. Retail sales of automotive fuel 

**cschnare** [Reply](#)

Consider moving this to top. Though, if they sell fuel, they should be completing the other survey and perhaps eliminate from this survey.

6/22/2021 5:09 PM



33. Retail sales of other home furnishings and accessories (Include artificial/silk flowers, plants, and trees; seasonal decorations; decorative accessories and home furnishings, such as lamps, lampshades, decorative glassware, vases, giftware, mirrors, pictures, picture frames, clocks, magazine racks, desk sets, and closet and bathroom accessories; and trophies and plaques.)

cschnare

Reply

I think you can safely remove all of this.

7/6/2020 12:18 PM

Type your reply...

34. Retail sales of women's clothing

35. Retail sales of men's clothing

36. Retail sales of men's and women's accessories (Include hats, gloves, neckwear, rain accessories, etc.) (Report costume jewelry on line 40.)

5000450000

37. Retail sales of costumes, vestments, and unisex clothing

5000425000

38. Retail sales of footwear and footwear accessories

5000475000

39. Retail sales of children's wear, including boys', girls', and infants' and toddlers' clothing and accessories

5000400000

40. Retail sales of costume and novelty jewelry

5000455000

41. Retail sales of fine jewelry and watches

5000500000

42. Retail sales of small household appliances, including mixers; blenders; can openers; toasters; coffee makers; fry pans; personal care appliances, such as hair dryers, curling irons, and shavers; tap water purifiers and filters; etc.

5000725000

43. Retail sales of televisions, and audio and video equipment

5000875000

44. Retail sales of audio and video recordings, including purchased downloads

cschnare

Reply

I think you can safely remove all of this.

7/6/2020 12:18 PM

Type your reply...

45. Retail sales of toys, games, and hobby and craft supplies

46. Retail sales of photographic equipment and supplies

47. Retail sales of glasses and contact lenses

48. Retail sales of hunting, fishing, hiking, and camping equipment

5001075000

49. Retail sales of exercise/fitness equipment

5001700000

50. Retail sales of bicycles and other cycles, all types, except children's sidewalk bikes, and parts and accessories

5001025000

51. Retail sales of golf equipment

5001050000

52. Retail sales of other sporting goods and equipment, excluding sport vehicles

5001100000

# 2017 Economic Census

## RT-44711 - Gasoline Stations with Convenience Stores

### Item 5: Sales, Shipments, Receipts, or Revenue Additional Information

EIN:  
Store / Plant:  
CFN:

#### ITEM 5: SALES, SHIPMENTS, RECEIPTS, OR REVENUE

What are the total sales of merchandise and other operating receipts?  
(Include excise taxes. Exclude sales taxes or other taxes collected.)

Check  
if  
None

cschnare

Reply

Consider adding a line for motor fuel sales

7/16/2020 2:42 PM

# 2017 Economic Census

## RT-44711 - Gasoline Stations with Convenience Stores

### Item 17: Principal Business or Activity

EIN:  
Store / Plant:  
CFN:

#### ITEM 17: PRINCIPAL BUSINESS OR ACTIVITY

Which ONE of the following best describes this establishment's principal kind of business or activity in 2017?  
If none of the provided selections seem appropriate, provide a specific description of the primary business activity.  
**Select only ONE.**

- 447190 101  Gasoline station
- 447110 001  Gasoline station with convenience store
- 447190 102  Gasoline station with automotive repair
- 447110 002  Convenience store selling gasoline
- 445120 002  Convenience store not selling gasoline
- 447110 004  Gasoline station with convenience store and car wash
- 447110 003  Gasoline station with convenience store and automotive repair

cschnare

Reply

remove or suggest using the other non-gasoline survey

7/6/2020 12:31 PM

RT-44711 - Gasoline Stations with Convenience Stores

Item 20: Class of Customer

EIN:  
Store / Plant:  
CFN:

ITEM 20: CLASS OF CUSTOMER

A. As a general business practice, did this establishment sell to household consumers and individual users in 2017?

Yes  
 No

B. Were 75% or more of this establishment's sales to retailers/wholesalers/distributors for resale in 2017?

Yes  
 No

C. Did this establishment require proof of business or professional license from new customers in 2017?

Yes  
 No

D. What was the estimated percentage of this establishment's total sales by class of customer in 2017?

**cschnare** [Reply](#)  
What does "by class of customer" mean?  
Could it be deleted?  
7/16/2020 2:41 PM

RT-44711 - Gasoline Stations with Convenience Stores

Item 22: Detail of Sales, Shipments, Receipts, or Revenue

EIN:  
Store / Plant:  
CFN:

ITEM 22: DETAIL OF SALES, SHIPMENTS, RECEIPTS, OR REVENUE

Of the \$,000.00 of Sales, Shipments, Receipts, or Revenue reported in Item 5, what products and services were included?  
**Select ALL that apply.**

Description
1. Retail sales of automotive fuels

**cschnare** [Reply](#)  
For this section, I think you should include most of the food, snack and beverage items listed in the convenience store survey.  
7/16/2020 12:43 PM

Not Mail - Report



Joseph Anderson <janderson@steeltubeinstitute.org>

Fri 8/7/2020 1:35 PM

To: ECON Content

Dear U.S. Census Bureau,

The Steel Tube Institute is a non profit trade organization representing steel tube manufacturers. In reviewing the past census surveys, I did not see any surveys that fit the description of our activities. As such, we are not planning on responding to your inquiry.

Best regards,

Joseph Anderson

**Steel Tube Institute**

Executive Director  
Office 847-461-1701



**Tucker, Russell J.** <[Russell.Tucker@nreca.coop](mailto:Russell.Tucker@nreca.coop)>  
Wed 8/12/2020 2:39 PM  
To: ECON Content

Please find attached NRECA's comments on the 2022 Economic Census. Thank you.

**Russell J. Tucker, Ph.D.**  
**Chief Economist | National Rural Electric Cooperative Association**  
**4301 Wilson Blvd., Arlington, VA 22203**  
**o: 703.907.5823 m: 202.365.9015**  
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August 12, 2020

Nick Orsini  
United States Department of Commerce  
Economics and Statistics Administration  
Associate Director for Economic Programs  
U.S. Census Bureau

Dear Mr. Orsini:

The National Rural Electric Cooperative Association appreciates the opportunity to comment on the development of the 2022 Economic Census.

The Economic Census has been a valuable tool in demonstrating the unique firm size characteristics of electric cooperatives as compared to the rest of the electric industry. The U.S. Small Business Administration defines small entity electric utility businesses by the number of employees in the firm. The Economic Census is essential to

supporting this analytical framework.

At the same time, the Bureau should identify opportunities to reduce the burden imposed on electric co-op staff in completing the survey document. We recommend eliminating or limiting the questions associated with Item 28: Special Inquiries. These questions appear to fall outside of the core Economic Census firm size benchmarks. For example, the 2017 questionnaire included a special inquiry on the cost of electricity. This information is readily available from the U.S. Energy Information Administration (EIA).

Thanks again for the opportunity to provide input on the development of the 2022 Economic Census. Please let me know if I can be of additional assistance.

Sincerely yours,

Russell Tucker  
Chief Economist  
[russell.tucker@nreca.coop](mailto:russell.tucker@nreca.coop)

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**Noa Banayan** <[noa@peopleforbikes.org](mailto:noa@peopleforbikes.org)>

Wed 8/12/2020 4:18 PM

To: ECON Content

Hello,

Thank you for the opportunity to comment on the 2022 Economic Census. Please find a letter responding to the questions sent to PeopleForBikes attached, and additional comments and highlights on the draft forms.

Please let us know if we can clarify any information we've shared.

Take care,  
Noa

**Noa Banayan**  
Federal Affairs Manager  
(she/hers)

**PeopleForBikes Coalition**  
1750 K St NW, 2nd Floor  
Washington, D.C. 20006  
**EMAIL:** [noa@peopleforbikes.org](mailto:noa@peopleforbikes.org)  
**MOBILE:** [508.283.0814](tel:508.283.0814)  
[PeopleForBikes.org](http://PeopleForBikes.org)

Support our vision for the future of bicycling  
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# 2017 Economic Census

RT-45111 - Sporting Goods Stores

## Item 7: Employment and Payroll Additional Information

EIN:  
Store / Plant:  
CFN:

### ITEM 7: EMPLOYMENT AND PAYROLL

#### Include:

- Full- and part-time employees working at this establishment, as reported on the Employer's Federal Tax Return, and filed under the Employer's Federal Tax Return.

#### Exclude:

**Alex Logemann**

Employee and payroll info could be interesting if we can break this out to bike shops.

## ITEM 17: PRINCIPAL BUSINESS OR ACTIVITY

Which ONE of the following best describes this establishment's principal kind of business or activity in 2017? If none of the provided selections seem appropriate, provide a specific description of the primary business activity. **Select only ONE.**

451110 211  Bicycle shop

# 2017 Economic Census

RT-45111 - Sporting Goods Stores

## Item 21: Method of Selling

EIN:  
Store / Plant:  
CFN:

### ITEM 21: METHOD OF SELLING

Which ONE of the following best describes this establishment's principal method of selling in 2017?

- Electronic commerce (selling goods or facilitating the sale of goods via the Internet or other electronic means)
- Store or display showroom (selling from a fixed or permanent location with physical displays of priced merchandise)
- Warehouse or office (including telephone/fax orders or outside sales representatives)
- Mail order

**Alex Logemann**

Method of selling could be interesting data.

jenni

Reply

How would order online and pick up in store be coded? What about order online and deliver to home? If ecommerce, it should be specified

# 2017 Economic Census

RT-45111 - Sporting Goods Stores

## Item 22: Detail of Sales, Shipments, Receipts, or Revenue

EIN:  
Store / Plant:  
CFN:


### ITEM 22: DETAIL OF SALES, SHIPMENTS, RECEIPTS, OR REVENUE

Of the \$,000.00 of Sales, Shipments, Receipts, or Revenue reported in Item 5, what products and services were included? **Select ALL that apply.**

Description

Select


Product Code

4. Retail sales of bicycles and other cycles, all types, except children's sidewalk bikes, and parts and accessories (Report used bicycles and other cycles on line 26i. Report maintenance and repair services and parts used in repair on line 28.)  5001025000 

- 5. Retail sales of other sporting goods and equipment, excluding sport vehicles (Report all other used sporting goods on line 26i and all sports vehicles under 12.)
  - a. Retail sales of tennis equipment
  - b. Retail sales of snow-skiing and snowboarding equipment
  - c. Retail sales of scuba and skin diving equipment
  - d. Retail sales of water skiing, surfing, and sail boarding equipment


**jenni** [Reply](#)  
Ideally we would want this broken out - bicycles (including children's bikes), bicycle parts/accessories; we would also want the above to exclude bicycles - we would want to include all human powered bicycles, tricycles, etc including ebikes and stationary bikes

12. Retail sales of boats and other sports vehicles  5001175000

- a. Retail sales of new boats, canoes, kayaks, motors, and parts and accessories  5001175003
- b. Retail sales of used boats, canoes, kayaks, motors, and parts and accessories  5001175006
- c. Retail sales of utility trailers, including horse/livestock trailers  5001175009 

**jenni** [Reply](#)   
Could bike trailers be part of bicycles?  
6/22/2021 6:41 PM

26. Retail sales of antiques, collectibles, art works, and other used goods (except transportation and machinery)

- a. Retail sales of antiques, items over 100 years old
- b. Retail sales of collectibles, including items which are old, but less than 100 years old, and limited in supply
- c. Retail sales of art goods, including original pictures and sculptures
- d. Retail sales of precious metals, coins, medals, and other numismatic items  5000850012
- e. Retail sales of stamps, autographs, and other philatelic materials and supplies  5000850015
- f. Retail sales of estate/antique jewelry  5000850018
- g. Retail sales of **used** clothing, footwear, personal accessories, jewelry, and related products  5000850021
- h. Retail sales of **used** home furniture, household appliances, kitchenware, home furnishings, and home lawn and garden goods  5000850024
- i. Retail sales of **used** home entertainment, recreation, and culture products, including books, CDs, musical instruments, sporting goods, bicycles, etc.  5000850027 

**jenni**  
We need used bikes broken out separately; including stationary  
8/4/2020 3:18 PM



Alex Logemann

Mail - Report

k. Retail sales of used household and per

27. Rental services for recreational, sports, and musical instruments)

Instructions say to use this for bike repair.

28. Maintenance and repair services for recreational, sports, and fitness equipment (including boats, motorcycl other sports vehicles, and musical instruments)

jenni

Reply

We need bicycle repair/service broken out

29. Leisure, recreational, and athletic instructional programs

## 2017 Economic Census

### MC-33690 - Motorcycle, Bicycle, and Parts Manufacturing

#### Item 5: Sales, Shipments, Receipts, or Revenue Additional Information

EIN:  
Store / Plant:  
CFN:

#### ITEM 5: SALES, SHIPMENTS, RECEIPTS, OR REVENUE

B. What was the value of products shipped for export?  
(This is a breakout of the \$,000.00 reported in **Item 5**, line A.)

**Include:**

- Products sold to the U.S. government to be shipped to foreign governments or economic assistance programs
- Products shipped to exporters or other wholesalers for export
- Products shipped to foreign subsidiaries or foreign divisions of your company

**Exclude:**

- Products shipped for further manufacture, assembly, or fabrication in the United States
- Freight charges
- Excise taxes
- Overseas sales to the U.S. government
- Shipments of bunker fuels and other supplies and equipment for U.S. vessels and planes engaged in foreign trade

Alex Logemann

This would be very helpful for Noa and I know to if we separate the reporting to just bicylce companies. Is anyone exporting?



\$  ,000.00

### MC-33690 - Motorcycle, Bicycle, and Parts Manufacturing

#### Item 17A: Principal Business or Activity

EIN:  
Store / Plant:  
CFN:

#### ITEM 17A: PRINCIPAL BUSINESS OR ACTIVITY

Which ONE of the following best describes this establishment's principal kind of business or If none of the provided selections seem appropriate, provide a specific description of the principal business activity. **Select only ONE.**

336991 001  Motorcycle, Bicycle, and Parts Manufacturing

336992 001  Military Armored Vehicle, Tank, and Tank Component Manufacturing

Alex Logemann

Should separate Bicycle vs. Motorcycle here at a minimum.

jenni


Separate bicycles

## MC-33690 - Motorcycle, Bicycle, and Parts Manufacturing

### Item 18: Detailed Cost of Materials, Parts, and Supplies

EIN:  
Store / Plant:  
CFN:

#### ITEM 18: DETAILED COST OF MATERIALS, PARTS, AND SUPPLIES

Description	Value	Census Material Code
1. Motorcycle and bicycle parts 		
2. Miscellaneous fabricated metal products (excluding hardware, containers, screw machine products (bolts, nuts, screws, etc.), bearing components, castings, forgings, and wire products)		

**jenni**

Separate bicycles



## MC-33690 - Motorcycle, Bicycle, and Parts Manufacturing

### Item 22: Detail of Sales, Shipments, Receipts, or Revenue

EIN:  
Store / Plant:  
CFN:

#### ITEM 22: DETAIL OF SALES, SHIPMENTS, RECEIPTS, OR REVENUE

Of the **\$,000.00** of Sales, Shipments, Receipts, or Revenue reported in **Item 5**, what products and services were included?  
*Select ALL that apply.*

Description	Select	Product Code
<b>Manufacturing of:</b>		
1. Motorcycles, including three-wheel, motorbikes, motor scooters, mopeds, and parts (including sidecars)	<input type="checkbox"/>	2009525000
2. Bicycles and other cycles, all types, except children's sidewalk bikes 		
3. Parts for bicycles, unicycles, and adult tricycles 		
4. Self-propelled golf carts (electric and gasoline) for		
5. Parts for self-propelled golf carts and industrial in-		

**Alex Logemann**

This already pretty good. Accessories I guess would be on another form for sporting goods?

**jenni** [Reply](#)

As in the retail survey we would want all bicycles including kid's bikes; ebikes, stationary bikes, etc.

# 2017 Economic Census

## WH-42391 - Sporting and Recreational Goods and Supplies

### Item 17A: Principal Business or Activity Additional Information

EIN:  
Store / Plant:  
CFN:

**Alex Logemann**

Bicycles wholesale probably needs to be added as a separate category to this page if we are going to get useful information.

#### ITEM 17A: PRINCIPAL BUSINESS OR ACTIVITY

Which ONE of the following best describes this establishment's principal kind of business or activity in 2017? If none of the provided selections seem appropriate, provide a specific description of the primary business activity. **Select only ONE.**

- 423910 006  Sporting and recreational goods and supplies, including bingo supplies
- 423910 003  Swimming pool equipment and supplies

**jenni**

[Reply](#)

Separate out bicycles (can be rec or transportation); include all described in the retail survey

## WH-42391 - Sporting and Recreational Goods and Supplies

### Item 21: Method of Selling

EIN:  
Store / Plant:  
CFN:

**Alex Logemann**

Probably less relevant question for our industry on the wholesale side.

#### ITEM 21: METHOD OF SELLING

Which ONE of the following best describes this establishment's principal method of selling in 2017?

Electronic commerce (selling goods or facilitating the sale of goods via the Internet or other electronic means)

Warehouse or office (including telephone/fax orders or outside sales representatives)

**jenni**

[Reply](#)

Same as above relative to ecommerce

## WH-42391 - Sporting and Recreational Goods and Supplies

### Item 22: Detail of Sales, Shipments, Receipts, or Revenue Additional Information

EIN:  
Store / Plant:  
CFN:

#### ITEM 22: DETAIL OF SALES, SHIPMENTS, RECEIPTS, OR REVENUE

Of the \$,000.00 of Sales, Shipments, Receipts, or Revenue reported in **Item 5**, what products and services were included? **Select ALL that apply.**

Description

**Alex Logemann**

Everything is lumped together. Would be good to break this down a lot more.

Select

Product Code

1. Wholesale sales of sporting and recreational equipment

a. Wholesale sales of small firearms and ammunition for sporting and hunting, reloading equipment, archery supplies, shooting aids, and accessories

b. Wholesale sales of bicycles and bicycle parts and accessories, including tires and tubes

**jenni**

[Reply](#)

explicitly include all bikes and ebikes

Item 27: Manufacturing Activities - Manufacturing Done Outside the U.S.

EIN:  
Store / Plant:  
CFN:

ITEM 27: MANUFACTURING ACTIVITIES - MANUFACTURING DONE OUTSIDE THE U.S.

In 2017, did this establishment have any manufacturing done on its behalf outside the U.S.?

*Include manufacturing done outside the U.S. by both affiliated and unaffiliated companies.*

**Alex Logemann**

Not sure which type of form a business like Trek would receive - would they get a wholesale form like this or a manufacturer form? These could be interesting if we could break it down to our industry.



**peopleforbikes**

P.O. BOX 2359 BOULDER, CO 80306  
PeopleForBikes.org | 303.449.4893

August 10, 2020

Re: FEEDBACK REQUESTED: 2022 Economic Census Questionnaire Content [P26057786839]

The PeopleForBikes Coalition is the national trade association representing companies that manufacture and distribute bicycles, bicycle parts and bicycle accessories. Nationwide, PeopleForBikes represents 260 bicycle businesses and more than 7,000 retail locations. The U.S. bicycle industry contributes \$88 billion annually to our economy and employs more than 780,000 Americans. Bicycling moves people efficiently and keeps people active and healthy.

We appreciate the opportunity to offer comments in regard to the 2022 Economic Census. Please find responses to the questions below, and comments in the attached survey forms.

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

- The bicycle industry doesn't differentiate between manufacturers and wholesalers as most companies that fit into one category would also fit into the other. For example, Giant Bicycles has several manufacturing facilities but also sells complete bikes to retailers. Which survey would a company that does both complete?

**Do the survey questionnaires accurately reflect what is occurring in your industry?**

- In the retailer survey there are several questions on method of selling (Item 21). In the bicycle industry we are seeing an increase in people ordering online and picking up in the store, having the bike delivered from the store, or having the bike delivered directly to the residence. It isn't clear which of the options in these items covers that purchase process. It would be good to be able to estimate sales that occur online vs. at the physical store location.

**What do your data users need that we are not asking?**

- In the retailer survey, item 22:
  - There is an option for "Retail sales of bicycles, other cycles, all types except children's sidewalk bikes and parts and accessories." Ideally, this would include all human powered unicycles, bicycles and tricycles, electric bikes, children's bikes, and stationary bikes.
  - We would like to break out bicycle trailers from "retail sales of utility trailers, including horse/livestock trailers."

- We would like to break out used bicycle sales from “Retail sales of used home entertainment, recreation, and culture products, including books, CDs, musical instruments, sporting goods, bicycles, etc.” This would be especially helpful for the industry.
- We would like to break out bicycle maintenance and repair services from “Maintenance and repair services for recreational, sports, and fitness equipment including boats, motorcycles, other sports vehicles, and musical instruments.”

- In the wholesaler/manufacturer survey item 17A: We would like to separate out all bicycles including all human powered unicycles, bicycles and tricycles, electric bikes, children’s bikes, and stationary bikes.

- In the wholesaler/manufacturer survey item 22 we would like to explicitly include all human powered unicycles, bicycles and tricycles, electric bikes, children’s bikes, and stationary bikes.

- In the manufacturer survey, item 18 we would like to break out bicycle parts from “motorcycle and bicycle parts.”

- In the manufacturer survey, item 22 we would want to include all human powered unicycles, bicycles and tricycles, electric bikes, children’s bikes, and stationary bikes.

**What questions are no longer relevant and could be eliminated?**

- For wholesalers/manufacturers, item 22 (method of selling) isn’t useful.

**Are certain questions difficult to complete? Why?**

- This is a difficult question for us to judge but we could pre-test this survey with some of our members if we had sufficient notice.

**Are instructions clear and helpful?**

- Same as above.



**Bill Frymoyer** <bfrymoyer@mema.org>

Wed 8/12/2020 4:57 PM

To: ECON Content

Cc: Ann Wilson <awilson@MEMA.ORG>; Mike Jackson <mjackson@oesa.mema.org>

**August 12, 2020**

**Dear Sir/Madam:**

**Thank you for the opportunity to respond to questions posed from the Bureau of the Census regarding the 2022 Economic Census. This response below is for the Original Equipment Suppliers Association (OESA) and the Motor**

# Equipment Manufacturers Association (MEMA). Please let me know if you have any additional questions for us.

Sincerely,

Bill Frymoyer  
Vice President, Public Policy  
Motor & Equipment Manufacturers Association (MEMA)  
202-312-9253  
202-309-0888 Cell  
[bfrymoyer@mema.org](mailto:bfrymoyer@mema.org)

## Responses Questions on the 2022 ECONOMIC CENSUS

Submitted by the Original Equipment Suppliers Association (OESA) and the Motor Equipment Manufacturers Association (MEMA)

- Do the survey questionnaires and instructions use terms/definitions that are common for your industry? **Yes.** However, we have heard from our members that they are unfamiliar with the NAICS nomenclature.
- Do the survey questionnaires accurately reflect what is occurring in you industry? **Somewhat.** The push towards electrification is the top priority in the industry. There is not a question that specifically tackles that issue.
- What do your data users need that we are not asking?
  - Questions have been posed on CAPEX expenditures that are not reported in the data results. This is useful from a benchmarking standpoint, if you are able to make a comparable estimate based on firms of the same revenue/employment size.
    - Again, most of the questions that carry an N response in the data output would be useful to benchmark against similar firms.
  - Questions about R&D expenditures would be helpful.
  - Questions about intellectual property value would be helpful.
  - Questions about sales and purchases of carbon tax credits would be helpful.
  - Cost of duties on imported materials and components would be interesting to see as well.
- What questions are no longer relevant and could be eliminated?
  - There are certain line items that are useless to industry analysts like cost of refuse. However, they are easy to answer, We may just unaware if there are interested parties for this information.
- Are certain questions difficult to complete? Why?
  - Somewhat. Many of the NAICS 3363 suppliers have diverse revenue streams that are sold outside of automotive, or outside of manufacturing all together. The composition of revenue detail would be incredibly time consuming to complete and it seems there could be holes in it, or you could end up with large gap in information because of lack of space. For example, question 13 only allows for 3 write in industry sectors.
- Are instructions clear and helpful?
  - Yes.



To: ECON Content

Hi Nick, I'm very sorry this is late, and I hope it can be of use. I was forwarded your email by Samantha Martinez, the Executive Director of the Association of Professional Model Makers. I just now manage to finish my input and get our Board of Directors to provide their input.

Our industry is Model Making Services and that includes Models Design and Fabrication as well as Developing and Making Prototypes. Model Making Services are mostly done within a company whose main purpose is something else like product manufacturing, design, architecture, engineering, film/TV and a few more. They shouldn't be having any problems with the model making aspect of the questionnaire.

If the Census seeks to capture independent model shops, my input on that is below. Briefly, Model Shops provide business services similar to Printers, Drafters, Sign-makers etc. If "Model Making Services" were placed at the same level as those others under the Survey Title "AS-5614X - Business Support Services (Enterprise Support)" that would make the Census easier to complete and would be more accurate.

Your questions:

Do the survey questionnaires and instructions use terms/definitions that are common for your industry? **Yes**

Do the survey questionnaires accurately reflect what is occurring in your industry? **Yes**

What do your data users need that we are not asking? **Independent or stand-alone model shops would want to list their main source of income as "Model Design and Fabrication" and "Developing and Making Prototypes".**

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

Are certain questions difficult to complete? Why? **It would be difficult to find one form that stand-alone model shops would use.**

Are instructions clear and helpful? **Yes**

Are there any other comments or opinions with regard to your industry? **If "Model Making Services" were placed at the same level as other service providers under the Survey Title "AS-5614X - Business Support Services (Enterprise Support)" that would make the Census easier to complete and would be more accurate.**

My research:

I checked the pdfs of the Survey Titles that I thought would be relevant to model makers. Three of them specifically mention "Model Design and Fabrication" and "Developing and Making Prototypes" as activities under Item 22: Detail of Sales, Shipments, Receipts, or Revenue.

- **PS-54140 - Specialized Design Services**
- **MC-33270 - Machine Shops**
- **PS-5409X - Specialized Design Services (Enterprise Support)**

Other ones I checked and discarded because they didn't mention models or prototypes are:



AS-5614X - Business Support Services (Enterprise Support)  
MC-3399D - All Other Miscellaneous Manufacturing  
PS-5404X - Engineering Services (Enterprise Support)  
PS-541C3 - Architectural, Engineering, and Related Services, Specialized Design Services, & Scientific Research and Development Services (Classification)  
PS-5413X - Other Professional, Scientific, and Technical Services (Enterprise Support)  
PS 5419C - Advertising and Related Services, Photography Services, & Other Professional, Scientific, and Technical Services (Classification)

My recommendation:

Put a new category “Model Making Services” under the Survey Title **AS-5614X - Business Support Services (Enterprise Support)**. Since “Model Design and Fabrication” and “Developing and Making Prototypes” already have their own separate numbers, they would go under **Item 17: Principal Business or Activity** and be repeated under **Item 22: Detail of Sales, Shipments, Receipts, or Revenue** just like printers, sign-makers and drafters are. This would be for **independent model shops**. Other firms that line-itemed their models and prototypes would still have to use another Survey Title. Please let me know if I can provide further assistance.

Thank you.

Bruce

Bruce Willey  
503-347-9022  
[brucewxyz@gmail.com](mailto:brucewxyz@gmail.com)



**CSD Director** <[director.csd@commerce.gov.mp](mailto:director.csd@commerce.gov.mp)>

Wed 9/16/2020 12:57 AM

To: ECON Content

Greetings,

The date to submit feedback has passed and we are requesting to allow us up to September 24th to submit.

Our CNMI Statistics Office has been greatly impacted by the pandemic and have lost 50% of it staff - we appreciate your understanding.

Justin



**AAP Info** <[info@publishers.org](mailto:info@publishers.org)>



Wed 9/16/2020 4:11 PM

To: ECON Content

Good afternoon Nick Orsini,

Thank you for providing an opportunity for feedback and questions and you work towards developing the 2022 Economic Census survey. I administer AAP's [statistics program](#) and this Economic Census is very helpful to us. Before providing comments, I will respond to the questions included in the email request. Please contact me with any follow-up questions or to provide the additional materials requested so that we can complete our analysis.

- Do the survey questionnaires and instructions use terms/definitions that are common for your industry? Yes. However, is there a more detailed version of instructions for Book Publishing? The instructions provided online do not address Items 3, 17, 22, and 28, which are the basis of the comments that follow.
  - Do the survey questionnaires accurately reflect what is occurring in your industry? The survey questionnaires for Book Publishing do not provide a complete or clear review of the industry.
  - What do your data users need that we are not asking? Please see the comments below.
  - What questions are no longer relevant and could be eliminated? Items 17, 22, and 28 are too limited to be a complete reflection of the industry.
  - Are certain questions difficult to complete? Why? Items 17, 22, and 28 may be difficult for education and journal Book Publishers because those markets seem to be excluded.
  - Are instructions clear and helpful? The instructions provided online have limited utility because they do not address Items 3, 17, 22, and 28.
  - Are there any other comments or opinions with regard to your industry? Yes, see below.
1. Who completes the questionnaire survey? Is it sent to CFOs, heads of HR, other staff?
  2. The instructions as for Gross Receipts. We use net revenue for our market analysis reports. How are returns and operating cost addressed in this questionnaire as operating cost reduces revenues?
  3. The instructions do not address Items 3, 17, 22, and 28, which are the basis of the comments that follow. Can you provide a fuller version of instructions?
  4. Form IN-5113-mu
    - a. Item 3
      - i. Include a question about the number of imprints or subsidiaries to connect as a reference point for Form IN-5113-su
    - b. Item 17
      - i. Where do journal publishers fit?
      - ii. Excluding publishing exclusively on the Internet may be a problem for education publishers that use online, internet-based platforms. Considering the limitations imposed by the COVID-19 pandemic, could the exclusion of internet be removed or updated?
        1. If updating is a possibility, we recommend "Book publishers, including publishing and printing combined along with online platforms, eBooks, digital audiobooks, and similar formats."
      - iii. What is meant by "internet publisher" and "internet publishing"?
        1. Many U.S. publishers sell eBooks that are exclusively on the internet and not printed. The separation of internet from publishing does not acknowledge that internet is a channel and tool used by publishers.
    - c. Item 22 (Selections)
      - i. Where does journals, audiobooks, eBooks, and platform-based publishing fit?
        1. 2 Professional, technical, and scholarly books *and journals*

- 2. 2b should be updated to Scholarly books *and journals*
  - d. Item 22 (Values)
    - i. Where does journals, audiobooks, eBooks, and platform-based publishing fit?
      - 1. 2 Professional, technical, and scholarly books *and journals*
      - 2. 2b should be updated to Scholarly books *and journals*
      - 3. 14a, b, and c: What are the options?
    - ii. Is the data (individual or aggregated) collected in Item 22 publicly available? If yes, where?
    - iii. Returns – The book publishing industry routinely expects nearly 20% of shipped product to be returned to publisher for full credit. This is part of the business model of publishing. How should these returns be treated? Once product is returned a subset is resold as ‘remainders’. Should that revenue be reported *as a deduction in Item 22?*
  - e. Item 28
    - i. Update 2 to: Internet *and online platforms*
    - ii. Update 3 to: Other media, including apps, book and toy sets, CD-ROM/DVD-ROM, diskette or cassette, microfilm, DVDs, gift sets, multimedia, product bundles, etc.
      - 1. CD-ROM/DVD-Rom is no longer a dominate media. Many publications previously provided by CD-ROM/DVD-Rom have been updated to internet and online platforms
    - iii. Add 4: Downloaded audio
    - iv. Add 5: Physical audiobooks
    - v. Add 6: eBooks
    - vi. Add 7: Instructional Materials
- 5. Form IN-5113-su
  - a. Item 17
    - i. Where do journal publishers fit?
    - ii. Excluding publishing exclusively on the Internet may be a problem for education publishers that use online, internet-based platforms. Considering the limitations imposed by the COVID-19 pandemic, could the exclusion of internet be removed or updated?
      - 1. If updating is a possibility, we recommend “Book publishers, including publishing and printing combined along with online platforms, eBooks, digital audiobooks, and similar formats.”
    - iii. What is meant by “internet publisher” and “internet publishing”?
      - 1. Many U.S. publishers sell eBooks that are exclusively on the internet and not printed. The separation of internet from publishing does not acknowledge that internet is a channel and tool used by publishers.
  - b. Item 22 (Selections)
    - i. Where does journals, audiobooks, eBooks, and platform-based publishing fit?
      - 1. 2 Professional, technical, and scholarly books *and journals*
      - 2. 2b should be updated to Scholarly books *and journals*
      - 3. 14a, b, and c: What are the options?
    - ii. Is the data (individual or aggregated) collected in Item 22 publicly available? If yes, where?
  - c. Item 28
    - i. Update 2 to: Internet *and online platforms*
    - ii. Update 3 to: Other media, including apps, book and toy sets, CD-ROM/DVD-ROM, diskette or cassette, microfilm, DVDs, gift sets, multimedia, product bundles, etc.

1. CD-ROM/DVD-Rom is no longer a dominate media. Many publications previously provided by CD-ROM/DVD-Rom have been updated to internet and online platforms
  - iii. Add 4: Downloaded audio
  - iv. Add 5: Physical audiobooks
  - v. Add 6: eBooks
  - vi. Add 7: Instructional Materials
    1. Education publishers for Prek-12 and higher education industries are also book publishers. It is not clear whether this survey addresses this market.
- d. Item 32 seems a better fit for Form IN-5113-mu or at a minimum should be included in Form IN-5113-mu as well.

Sincerely,

**Syreeta N. Swann** | Vice President, Programs and Administration

AAP | Association of American Publishers | 455 Massachusetts Avenue NW Suite 700 | Washington, DC 20001

1-202-220-4545 (direct) | 1-202-347-3690 (Fax) | [info@publishers.org](mailto:info@publishers.org)

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

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**Vai Filiga** <[vai.filiga@doc.as](mailto:vai.filiga@doc.as)>

Mon 9/21/2020 4:25 PM

To: ECON Content

Nick,

I am wrapping up the Population and Housing census and I missed the deadline for the economic census comment period. Any chance of reopening this for comments?

Vai

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**CSD Director**

Thu 9/24/2020 11:05 PM

To: ECON Content

Cc: Fermin Sakisat <[fsakisat@commerce.gov.mp](mailto:fsakisat@commerce.gov.mp)>; Brianna Oronigo <[boronigo@commerce.gov.mp](mailto:boronigo@commerce.gov.mp)>

Island Greetings,

Thank you once again for allowing us extra time to review and submit our feedback.

Please see attached document for our feedback.

Regards,  
Justin



**CENTRAL STATISTICS DIVISION**  
COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS  
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<http://commerce.gov.mp/divisions/central-statistics/>

September 24, 2020  
2017 CNMI Economic Census Review Feedback

A review of our field follow-up notes and feedback from stakeholders reveals no major concerns with the 2017 Economic Census of the CNMI. Questions and Instructions for each of the Sectors were clearly worded and understood.

A few stakeholders had difficulty with the Portal but were assisted by the CSD staff.

All Sectors of the local business are covered in the Census and questions for each of the Sectors are important and useful.

In future Census, we request to include all Businesses in the Scope of the Economic Census – businesses with and without employees.

Additionally, we also request that a question on Ethnicity of Ownership be included if possible.

Besides, Gender and Citizenship of Ownership, having more demographic of the local business community helps with local business planning and policymaking decisions.

The Economic Census is the only source of business data the local government and the local business community rely on for business planning and policy decision making.

# Memorandum

To: Bobby Nusz,  
Economic Census Assistant Survey  
Director Staff Chief

From: Aya Hamano,  
Chief, Program Coordination Office

Date: April 26, 2021

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## Comments on 2022 ECIA Proposals

### Overview

BEA's largest concerns for the 2022 ECIA are that:

1. Total operating expenses mean the same thing across industries.
2. Respondents know where to report capitalized repairs/improvements, i.e. major repairs or improvements that increase the value of the equipment or structure that are chargeable to fixed assets accounts. For GDP, we would prefer that these expenditures be reported within Capital Expenditures rather than Selected Expenses. For the 2022 ECIA, we are wondering if there are ways to clarify (e.g. within the instructions) where respondents should include these expenditures.

More detailed comments/questions by item are included below.

### Class of Customer

1. BEA does not use hotels and restaurant class of customer separately, so these could be combined. We agree that because a lot of the restaurants in the island areas are part of hotels, the split could be problematic for respondents.
2. The categories "other" and "other services" could be confusing for respondents. BEA would likely combine the two categories when using the data.

### Selected Expenses

1. Within the instructions for "all other operating expenses," would it make sense to specify the exclusion of anything included in Item 13 (Capital Expenditures) and also ask to include

routine maintenance and repairs? For example, “Include all the other operating expenses incurred by the establishment, such as payroll, benefits, utilities, depreciation, computer and communication services, office supplies, **and routine maintenance and repairs**. Do not include capital expenditures **included in Item 13**, interest, and/or bad debt.”

2. For the Construction form, add a catch-all category for “all other operating expenses” in case there are items that do not fall under “all other purchased services”. Alternatively, replace “all other purchased services” with “all other operating expenses” (and eliminate the sections that separate cost of materials from cost of services).
3. Can Census publish more industries in the selected expense detail table (IA1700SUBJ06)? For 2017, the table showed Wholesale, Retail, Information, Finance, and Accommodations. For 2022, can it be published for Utilities and Transportation/warehousing?

## Capital Expenditures

1. Suggested capital expenditure instructions for all forms except Manufacturing and Construction:

### ITEM 13: CAPITAL EXPENDITURES

Report expenditures made during 2022 to purchase buildings, structures, and machinery and equipment that are chargeable to the fixed assets accounts and for which depreciation accounts are maintained. Include improvements that increased the value of the property or adapted it for another use (for example, upgrading the heating and air conditioning system, upgrading kitchen or bathroom facilities, adding universal access improvements, or any other permanent improvement that would add to the value and useful life of the property). Also include the cost of buildings or structures and machinery and equipment acquired as the lessee under capital lease agreements during 2022. Exclude the costs for routine maintenance and repairs.

2. Suggested capital expenditure instructions for the Manufacturing and Construction forms:
  - A. Capital expenditures for NEW buildings, structures, machinery and equipment, and job-site vehicles  
Report expenditures made during 2022 to purchase NEW buildings, structures, and machinery and equipment that are chargeable to the fixed assets accounts and for which depreciation accounts are maintained. Include additions to construction-in-progress for company-owned projects lasting more than one year, as depreciable assets should be reported currently rather than once the project has been completed and is in use. Also include the value of depreciable assets acquired through mergers and acquisitions. Exclude the costs for routine maintenance and repairs.

**B. Capital expenditures for USED buildings, structures, machinery and equipment, and job-site vehicles**

Report expenditures made during 2022 to purchase USED buildings, structures, and machinery and equipment that are chargeable to the fixed assets accounts and for which depreciation accounts are maintained. Include improvements that increased the value of the property or adapted it for another use (for example, upgrading the heating and air conditioning system, upgrading kitchen or bathroom facilities, adding universal access improvements, or any other permanent improvement that would add to the value and useful life of the property). Also include capital expenditures for leasehold improvements (made to property leased from others). Exclude the costs for routine maintenance and repairs.

# Economic Census of Island Areas Form Comments from BEA for 2022 ECIA

Last updated: February 9, 2021

## Summary:

Comments and requested changes are based off a review of the 2017 ECIA forms and are grouped into 7 sections: Class of Customer, Value of Inventories, Construction, Wholesale Trade, Accommodations and Food Services, Other Form Changes, and Reporting Changes. Reporting Changes were previously requested in November 2020 but are included here again for convenience.

## I. Class of Customer:

1. For the Puerto Rico form for “Other Services,” add the percentage of exports. See the snip below as an example:

D. What was the estimated percentage of sales and receipts generated from exports?  
(Include all exports from this Territory to foreign countries, the United States, and other U.S. Territories)

2017  %

2. The three Manufacturing forms for all the island areas (Puerto Rico, American Samoa, and Selected U.S. Territories) need to be modified to correct an inconsistency in Item 28: Special Inquiries. Section B of Item 28 asks for the distribution of the value of shipments or contract work for customers located within the territory. However, the two box headings indicate that the value is reported in Item 5, line A and B respectively. This is not correct, because Item 5 provides the value of shipments including exports. The box headings in Item 28B should indicate that the value is reported in Item 28A, line 3. See the snip below for the current wording:

**B. Distribution of Shipments and Contract Work Performed for Customers in Puerto Rico by Class of Customer**

What is the distribution of value of shipments or contract work for customers located in Puerto Rico by class of customer?

	2017 Estimates are acceptable Value of products shipped (reported in Item 5, line A) by customer location (1) Report in Thousands	2017 Estimates are acceptable Value of contract work done (reported in Item 5, line B) by customer location (2) Report in Thousands
1. Wholesalers	\$ <input type="text"/> ,000.00	\$ <input type="text"/> ,000.00
2. Retailers	\$ <input type="text"/> ,000.00	\$ <input type="text"/> ,000.00

3. Add “Accommodation and food services” as a class-of-customer item to all the Manufacturing forms (Puerto Rico, American Samoa, and Selected U.S. Territories).
4. Add “Municipal government” as a class-of-customer item to the Manufacturing form for Puerto Rico.
5. Update “Building contractors, heavy construction, and special contractors” to “Construction contractors” for all forms for Puerto Rico.



6. Update “Restaurants, hotels, food services, and contract feeding” to “Accommodation and food services” for all forms for Puerto Rico.
7. Update “Restaurants, food services, and nightclubs” to “Food services and drinking places” for all forms for American Samoa and Selected U.S. Territories.
8. Update “Hotels or other traveler accommodations” to “Accommodation” for all forms for American Samoa and Selected U.S. Territories.
9. Update “Retailers” to “Retailers for resale” and “Wholesalers” to “Wholesalers for resale” on all three of the Manufacturing forms.

## II. Value of Inventories

1. The table below describes, by industry, requested changes to the form questions for Inventories.

Industry Sector	Change requested from 2017 form (Y/N)	Description of change
Manufacturing	N	None. Question should remain as is.
Wholesale trade	N	None. Question should remain as is.
Retail trade	N	None. Question should remain as is.
Finance, Insurance, Real Estate, Rental and Leasing	Y	Add an item for the value of total inventories owned by the establishment (i.e. no breakout by type)
Accommodation and Food Services	Y	Add an item for the value of total inventories owned by the establishment (i.e. no breakout by type)
Utilities, Transportation, and Warehousing	Y	Add an item for the value of total inventories owned by the establishment (i.e. no breakout by type)
Construction	Y	Add an item for the value of inventories owned by the establishment for inventories for materials and supplies. (Exclude work-in-progress and finished units.) See Example A on next page.
Other Services	Y	Add an item for the value of total inventories owned by the establishment (i.e. no breakout by type)

Example A:

ITEM 9: VALUE OF INVENTORIES

Include:

- **Inventories**, regardless of where held, for materials and supplies owned by this establishment as of December 31

Exclude:

- Work-in-progress and finished units

Using current cost, what was the value of **inventories** owned by this establishment as of December 31? (If using LIFO method of evaluation, adjust to obtain FIFO or current cost.)

Check if None

2017  
\$  ,000.00

Check if None

2016  
\$  ,000.00

III. Construction

1. Add a line for “All other operating expenses” to item 16 “Selected expenses.” See the snip below as an example:

7. **All other** operating expenses  
(Include payroll, benefits, utilities, depreciation, etc. Exclude cost of goods sold, interest, capital expenditures, and bad debt.)  \$  ,000.00

IV. Wholesale Trade

1. Add an item for “Shipping and Handling” similar to that on the U.S. forms. See the snip below as an example:

Item 24: **Shipping and Handling** - Continued

EIN:  
Store / Plant:  
CFN:

ITEM 24: SHIPPING AND HANDLING

What were the total receipts of this establishment from customers for **shipping and handling** of merchandise?  2017 \$  ,000.00

Are receipts for **shipping and handling** included in sales and receipts (reported in Item 5)?

Yes  
 No

## V. Accommodation and Food Services

1. Add a line for “Contract Feeding” to Item 28: Special Inquiries. See the snip below as an example:

Item 28: Special Inquiries - **Contract Feeding**

EIN:  
Store / Plant:  
CFN:

**ITEM 28: SPECIAL INQUIRIES - CONTRACT FEEDING**

1. What was the percentage of this establishment's total sales and receipts (reported in **Item 5**) from providing food service UNDER CONTRACT to another company; a hospital; or a governmental, penal, or educational institution to feed its employees, patients, inmates, passengers, students, etc.?

Check if None

2017 Whole percent of sales and receipts  %

## VI. Other Form Changes

1. Add “Mining” to name of the form “Utilities, Transportation, and Warehousing,” at least for Puerto Rico.
2. Edit form instructions for Utilities and Manufacturing to state that non-operating income such as interest should be excluded.

## VII. Reporting Changes

Requested change	Industry	Territories	Notes
Report cost of resales for manufacturing sector	Manufacturing	AS, NM, GU, VI	Currently published for retail and wholesale only for 4 smaller territories. Published for retail, wholesale, and manufacturing for Puerto Rico.
Report inventories by stage of fabrication for the manufacturing sector	Manufacturing	AS, NM, GU, VI	If it is not possible to publish this, would it be possible to create a special tab of this for AS and VI?
Exclude interest from total operating expenses for all industries except FIRE	All except FIRE	All	This is at most a reporting change only for industries that in 2017 have interest included in total reported OPEX. No change in form or instructions is needed.
Report interest receipts (if collected) in a separate column for all industries except FIRE	All except FIRE	All	This is only if interest receipts are collected. Our goal is to exclude them from receipts/sales/shipments when we use them in estimates of gross output.
Report interest expenses in a separate column for all industries except FIRE	All except FIRE	All	This is at most a reporting change only. No change in form or instructions is needed.