

SUPPORTING STATEMENT A
U.S. Department of Commerce
U.S. Census Bureau
Monthly Wholesale Trade Survey
OMB Control No. 0607-0190

Abstract

The U.S. Census Bureau requests a three-year extension of the Monthly Wholesale Trade Survey (MWTS). The MWTS canvasses firms primarily engaged in merchant wholesale trade that are located in the United States, excluding manufacturers' sales branches and offices (MSBOs). This survey provides the only continuous measure of monthly wholesale sales, end-of-month inventories, and inventories-to-sales ratios. The sales and inventories estimates produced from the MWTS provide current trends of economic activity by kind of business for the United States. Also, the estimates compiled from this survey provide valuable information for economic policy decisions by the government and are widely used by private businesses, trade organizations, professional associations, and other business research and analysis organizations.

Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

Estimates from the MWTS are released in three different reports each month. High level aggregate estimates for end-of-month inventories are first released as part of the Advance Economic Indicators Report. Second, the full Monthly Wholesale Trade Report containing both sales and inventories estimates is released. Lastly, high level sales and inventories estimates from the MWTS are also released as part of the Manufacturing and Trade Inventories and Sales (MTIS) report.

The MWTS estimates are also used as an input in the Monthly Wholesale Real Dollar Estimates experimental data product. This supplemental MWTS report was first published on September 19, 2022, and then was revised and appended on September 09, 2024. The estimates were created from the nominal MWTS sales and inventory series using product weights developed from existing Census Bureau data releases and price indexes from the Bureau of Labor Statistics (BLS). Within the report, real dollar sales, inventories, and inventories-to-sales ratio estimates and corresponding residuals are available for Total Merchant Wholesalers, except Manufacturers' Sales Branches and Offices, as well as the two 3-digit and eighteen 4-digit North American Industry Classification System (NAICS) wholesale subsectors. Monthly estimates are available from January 2012 forward and are published with the MWTS report each month.

The real dollar estimation process uses seasonally adjusted, nominal wholesale data to provide the best information possible, without showing seasonal impacts. A typical month involves not only incorporating the latest month but also revising data from the four prior months and current month prior year. This experimental product meets the increasing demand by data users for estimates that remove both seasonal and price effects.

As one of the Census Bureau's principal economic indicators, the estimates produced by the MWTS are critical to the accurate measurement of total economic activity of the United States. The estimates of sales made by wholesale locations represent only merchant wholesalers, excluding MSBOs, who typically take title to goods bought for resale and sell to other businesses. The sales estimates include sales made on credit as well as on a cash basis but exclude receipts from sales taxes and interest charges from credit sales.

The estimates of inventories represent all merchandise held in wholesale locations, warehouses, and offices, as well as goods held by others for sale on consignment or in transit for distribution to wholesale establishments. The estimates of inventories exclude fixtures and supplies not for resale, as well as merchandise held on consignment, which are owned by others. Inventories are an important component in the Bureau of Economic Analysis' (BEA) calculation of the investment portion of the Gross Domestic Product (GDP).

The Census Bureau publishes wholesale sales and inventories estimates based on the North American Industry Classification System (NAICS), which has been widely adopted throughout both the public and private sectors.

The Census Bureau conducts this voluntary survey under the authority of an Act of Congress, Title 13, United States Code, Sections 131 and 182.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The Census Bureau collects monthly sales, end-of-month inventories, number of establishments covered by the report, and the ending date of the report period if the data provided are for a period other than the calendar month. The Census Bureau then tabulates the collected data to provide, with measurable reliability, statistics on sales, end-of-month inventories, and inventories-to-sales ratios for merchant wholesalers, excluding MSBOs. The information is collected on a monthly basis. More information about collection methods is described in section three.

The BEA is the primary Federal user of data collected in the MWTS. The BEA uses estimates from this survey to prepare the national income and product accounts (NIPA), input-output accounts (I-O), and gross domestic product (GDP) by industry. End-of-month inventories are used to prepare the change in private inventories component of GDP. The BEA also uses the Advance Economic Indicators Report to improve the inventory valuation adjustments applied to estimates of the

Advance Gross Domestic Product. Sales are used to prepare estimates of real inventories-to-sales ratios in the NIPAs, extrapolate proprietors' income for wholesalers (until tax return data become available) in the NIPAs, and extrapolate annual current-dollar gross output for the most recent year in annual I-O tables, GDP-by-industry, and advance GDP-by-industry estimates.

The Bureau of Labor Statistics uses the data as input to its Producer Price Indexes and in developing productivity measurements. Private businesses use the wholesale sales and inventories data in computing business activity indexes. Other government agencies and businesses use this information for market research, product development, and business planning to gauge the current trends of the economy.

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.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

Respondents are initially contacted at sample start by mailing them the selection letter (Attachment 1). Companies with multiple physical locations will report based on the form SM4217-A (Attachment 2). Companies reporting for a single physical location will report based on the form SM4217-E (Attachment 3). Respondents have an option of reporting their data online or giving data by telephone. Paper forms are no longer included in the outgoing mail process and were discontinued in the Fall of 2025.

After initial contact at the start of the sample, respondents have a choice to receive future correspondence by a mailed letter (Attachment 11), or email (Attachments 7, 8). The email notice informs the respondent that the Census Bureau's online system "Centurion" is open for reporting for the specified reference month. Over the past six months (January-June 2025), on average 77% of our initial monthly contact with survey units was by email.

The use of the Centurion online reporting system provides respondents with a convenient reporting method and reduces respondent burden. This method of data collection also reduces the amount of data that has to be keyed; therefore, reducing data capture costs. Centurion also allows respondents to print copies of their completed form(s) for their records. No additional software is needed by the respondent. In addition, all data submitted through Centurion are encrypted. Over the past six months (January-June 2025), an average of 95% of the total response came from online reporting. The Centurion login page is shown in Attachment 4.

In 2021, MWTS added the ability for respondents to report prior months' data through Centurion.

Historically, they could only report the month that was currently being collected. Allowing respondents to report for prior months increases MWTS' final response rates and improves accuracy of the estimates with revisions.

An automated system is used for check-in of returned data and telephone follow-up scheduling for delinquents. This allows for a more-timely identification of completed questionnaires and fewer follow-up calls to respondents. Over the past six months (January-June 2025), an average of 4.4% of the total response came from telephone and 0.6% via mail.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2.

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

Wholesale trade data are collected on an annual basis in the Annual Integrated Economic Survey (AIES) [OMB No. 0607-1024] and in the quinquennial Economic Census. The Annual Wholesale Trade Survey (AWTS) transitioned to the AIES. The data formerly collected for the AWTS will now be collected as part of the AIES, which began data collection in March 2024. However, while the annual data are established to provide figures on wholesale trade in the intervening years between censuses, they do not provide a sufficient number of data points from which to do trend analysis as input to monitoring the current state of the economy. The monthly estimates are the only available data source for use as a trend series for evaluating current business conditions.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

The stratified random sample design used in the MWTS uses the least number of sampling units required to produce national level estimates with the desired level of reliability, thus minimizing respondent burden. Sales and inventories data are collected from wholesale units of all sizes. The effective sampling rate for the smallest businesses is 1 in 500. The selection of a new sample every five to seven years replaces about 95 percent of the small and medium-sized units that participate in the survey, thus minimizing respondent burden by redistributing reporting requirements. The latest sample was introduced in April 2018. Currently, there is not a scheduled reselection of the MWTS sample, although it is anticipated to be late 2026.

Furthermore, units are not required to maintain additional records. The data requested are generally carried on existing company records. Carefully prepared estimates are acceptable if book figures are not available. Finally, interviewers use computers with interactive edits of response data to conduct follow-up and delinquent interviews, thus reducing the number of calls back to respondents.

The Census Bureau accepts data prepared on a company's own form. This relieves the respondent

of the burden of posting data to a report form.

The Census Bureau also uses a Full Service Account Manager (FSAM) program to reach a chosen group of large companies that cross multiple surveys. MWTS has implemented the usage of this program in order to reduce respondent burden. The Account Manager is the primary contact with the company to streamline the company's reporting across multiple surveys. Companies included in this program receive correspondence that asks the respondent to reach out to their Census Account Manager for assistance completing the survey (Attachments 8, 10).

In addition to the FSAM program, the Census Bureau also utilizes alternative data sources to reduce respondent burden. Companies have the option to report consolidated data for their entire organization in a single submission. The Census Bureau then takes on the responsibility of breaking out the data by survey. This approach shifts the burden of survey-specific data segmentation from the company to the Census Bureau, streamlining the reporting process for respondents.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The monthly sales and inventories estimates from the MWTS are the only source of monthly wholesale sales and inventories data and are used extensively by government and private economists to evaluate current economic conditions. These estimates are important economic indicators and provide timely input for computation of the National Income and Product Accounts. Less frequent data collection would create a gap in statistics available on a monthly basis for this sector of the economy. Moreover, these statistics provide current-to-previous month and year-to-year trend data that are essential for evaluating current conditions and for formulating economic policy.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

The collection of these data is consistent with each of the Office of Management and Budget (OMB) guidelines above.

- 8. If applicable, provide a copy and identify the date and page number of publications in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The Census Bureau issued a pre-submission notice published in the Federal Register dated August 14, 2025, located in Vol. 90, No. 155, on pages 39180-39181, inviting the general public and other Federal agencies to comment on the information collected.

The only comment received was a letter from BEA expressing support for the MWTS (Attachment 5). The BEA is the Census Bureau's main source of consultation on the MWTS and ongoing communication occurs between the agencies to address any program issues. We followed up with BEA and thanked them for their support.

There is an ongoing effort to request feedback from respondents in the online reporting instrument, "Centurion" which is located within the burden statement in Attachment 6.

- 9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

The Census Bureau does not provide any payment or gift to respondents for participating in MWTS.

- 10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.**

All reports are strictly confidential and are immune from legal process. The respondents are

notified with the following confidentiality and OMB number statements (Attachment 11):

“Title 13 United States Code (U.S.C.), Section 131 and 182 authorizes the Census Bureau to conduct this collection and to request your assistance. 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.”

“This collection has been approved by the Office of Management and Budget (OMB). The eight-digit OMB approval number is 0607-0190 and appears at the upper right of this screen. Without this approval, we could not conduct this survey.”

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The MWTS does not contain questions of a sensitive nature. The survey requests financial data concerning business units. It requests only data for company totals, and under routine accounting practices these data are normally maintained in the units' records.

12. Provide estimates of the hour burden of the collection of information.

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under 'Annual Cost to Federal Government' (Item #14).**

There are approximately 4,200 businesses selected to report in the MWTS and the total number of businesses will approximately stay the same in future samples. According to information provided

by a sample of respondents, the estimated time to complete the questionnaire is approximately 7 minutes. The Monthly Wholesale Trade Burden Statement is shown in Attachment 6. This translates into an estimated annual burden of 5,880 hours.

Estimated Annualized Respondent Burden Hours

| Sample Size | Annual Responses | Total Responses | Hours | Total Annual Burden Hours |
|-------------|------------------|-----------------|--------|---------------------------|
| 4,200 | 12 | 50,400 | .11666 | 5,880 |

The estimated annual cost to respondents is approximately \$230,908, which is based on the response burden of 5,880 hours at approximately \$39.27 per hour (median hourly salary for accountants and auditors; Occupational Employment Statistics - Bureau of Labor Statistics May 2024 National Occupational Employment and Wage Estimates; \$39.27 represents the median hourly wage of the full-time wage and salary earnings of accountants and auditors SOC code 13-2011). <https://www.bls.gov/oes/tables.htm>.

13. Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

The information requested is of the type and scope normally maintained 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.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The total cost to the Federal Government for the MWTS is expected to be relatively fixed over the upcoming three years at approximately \$2.5 million per year, all borne by the Census Bureau. This estimate includes the cost for such things as data collection, processing, review of tabulated data, publication, equipment, overhead, printing, support staff, etc.

15. Explain the reasons for any program changes or adjustments reported in ROCIS.

There are no changes to the information collection since the last OMB approval.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Letters or login information are sent to respondents at the end of each month and request data for the month just ending. Businesses are asked to report online by the 6th working day of the month. Data are analyzed and tabulated at the two-, three-, four-, and one selected five-digit NAICS level.

High level inventory estimates are released in the Advance Economic Indicator Report approximately 25 to 29 calendar days after the close of the reference month. The full Monthly Wholesale Trade Report containing both sales and inventories estimates is released approximately 5-6 weeks after the close of the reference month. The Monthly Wholesale Real Dollar Estimates experimental data product is published as a supplement to the MWTS Report, on the same schedule. Lastly, high level estimates for sales and inventories data are released in the Manufacturing and Trade Inventories and Sales Report approximately 6 weeks after the reference month.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

18. Explain each exception to the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

The agency certifies compliance with [5 CFR 1320.9](#) and the related provisions of [5 CFR 1320.8\(b\)\(3\)](#).