

SUPPORTING STATEMENT
UNITED STATES INTERNATIONAL TRADE COMMISSION QUESTIONNAIRE

Investigation No. 332-608

USMCA Automotive Rules of Origin: Economic Impact and Operation, 2027 Report

Part B-Collection of Information Employing Statistical Methods

1. Response universe, sample sources, and sampling strata

Objectives

Section 202A(g)(2) of the United States-Mexico-Canada Agreement Implementation Act (19 U.S.C. 4532(g)(2)) (USMCA Implementation Act) requires that the Commission submit a series of five biennial reports that present an overview of the USMCA automotive rules of origin (ROOs) and their impact on the U.S. economy and automotive industry, effect on U.S. competitiveness, and relevancy in light of technological changes. The Commission will use a survey of motor vehicle producers in the United States to collect data not available publicly to analyze the impact of the ROOs on these factors for the third report in this series, scheduled to be submitted to the President, the House Committee on Ways and Means, and the Senate Committee on Finance by July 1, 2027.

Respondent universe

The respondent universe is motor vehicle producers manufacturing and assembling vehicles in the United States. There are no more than 25 of these firms, each of which will receive a questionnaire. The statistical unit is the firm rather than the manufacturing plant.

The respondent universe includes motor vehicle producers in the United States, net of duplicative records, identified from contact lists from automotive industry groups, unions, and trade associations.

Design

A link to the online questionnaire will be emailed to the entire population. The questionnaire has been designed to be as clear and succinct as possible to gather the specific material as required under the USMCA Implementation Act. The Commission has conducted four factfinding census surveys historically, including the census survey for the 2025 USMCA Auto ROOs report, which yielded response rates between 65 and 100 percent. Due to the small population and firm's 100 percent participation in the 2025 USMCA Auto ROOs survey, Commission staff are confident that a 100 percent response rate is feasible. Staff will make efforts to contact nonresponding firms by sending reminder emails and calling individual firms to maximize response rates. For a response rate of less than 90 percent, responses may be adjusted based on known population characteristics like market share and other metrics available for all firms in the population (see 2.b.).

2. Collection of information employing statistical methods

a. Statistical methodology for stratification

All firms in the population will receive a questionnaire, and therefore no sampling procedures are required. Due to the small population, no stratification methods will be used.

b. Estimation Procedure

Estimates will be based on weighted data, although each responding firm will initially be assigned a weight of 1 because the Commission is collecting data from the entire population. The weighting procedure will incorporate a nonresponse adjustment factor after the data collection period has closed.

- *Nonresponse adjustment:* The nonresponse adjustment factor is designed to attenuate bias due to differential response rates. This adjustment will be calculated using business characteristics, if warranted. See the section below on accuracy and reliability of information collected for further discussion.

c. Unusual problems requiring specialized sampling procedures

No unusual problems were encountered.

d. Any use of periodic (less frequent than annual) data collection cycles to reduce burden

This data collection is intended to occur once and therefore will not be repeated on a periodic basis. As such, the total recurring annual cost burden is zero.

3. Methods to maximize response rates and deal with non-response

a. Maximizing response rates

Commission staff will employ several techniques to increase the response rates of questionnaire recipient businesses. Recipients will receive separate notices that (1) notify them that their business was selected for the survey, (2) direct them to complete the questionnaire, and (3) remind them, if necessary, to complete the questionnaire before the deadline. Once the submission deadline has passed, businesses that have not responded will receive an additional reminder. Each of these communications will include a phone number and email address for the investigative team by which businesses can receive help with filling out the questionnaire or have their questions answered regarding the survey and/or study answered. Commission staff may also contact businesses directly, via phone or email, to urge them to complete the questionnaire and to answer any questions they may have regarding this information collection or investigation in general. Commission staff may also contact businesses, via phone or email, to correct information or fill in incomplete responses, or solicit additional information about a response. The burden associated with follow-up calls or emails is included in the total response burden amount.

In addition to pre-contact and follow-up, the questionnaire itself has been designed to be as clear and succinct as possible to gather the specific information required under the USMCA Implementation Act. (See discussion of testing below.) This clarity and brevity should reduce burden and improve response rates. The questionnaire will clearly point out that businesses are obligated by law to respond. Finally, the ability to access, fill out, and submit the questionnaire electronically is likely to increase response rates.

b. Accuracy and reliability of information collected

The response rate in other censuses the Commission has conducted was between 65 and 100 percent. The Commission will examine questionnaire responses to detect and correct for any non-response bias. The team will first examine conditional response rates for groups of businesses based on characteristics available in the population that are hypothesized to impact outcomes of interest. These may include variables such as market share. Any differences in response rates can be further investigated through logistic regression analysis, using business characteristics to predict whether a recipient responded to the questionnaire. If the results of the logistic regression indicate that one or more of the characteristics investigated above affect the propensity of a questionnaire recipient to respond, then those characteristics will be examined to determine whether they are associated with differences in the outcome variables under study, across the dataset of questionnaire responses collected. If any sources of non-response bias are found, they can be controlled for by the development of weights, which can then be used in the extrapolation of results to the entire population.

The Commission expects that data acquired through the survey can be measured both accurately and reliably.

4. Tests of procedures or methods to minimize burden or improve utility

The Commission sought comments on the questionnaire from industry representatives and associations through two phases of testing. The first set of testers provided feedback in areas such as availability of data, reporting burden, product coverage and definitions, clarity of instructions, disclosure, and reporting format. The second set of testers provided feedback on specific questions for understandability and feasibility of providing the data requested.

In addition to testing, the questionnaire has been made available for public comment. Notice of the availability of the draft questionnaire for comment was published in the *Federal Register*. It has also been extensively reviewed within the Commission. Industry analysts and economists have reviewed the questionnaire to ensure it requests information needed to adequately respond to the topics as directed in the USMCA Implementation Act while imposing a minimum burden on the responding businesses.

5. Contact information

Collection and analysis of the data will be the responsibility of the Office of Analysis and Research Services, and the Office of Industry and Competitive Analysis within the Commission. The project leaders for this investigation are Fernando Gracia, Conor Hargrove, and Tamara Gurevich. The survey team can be reached by email at USMCAAutoROO@usitc.gov. If you prefer to contact them by phone, please call Conor Hargrove at 202-708-5409.