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Commodity Flow Survey Federal Register Notice

This comment pertains to the product classification system used to collect the Commodity Flow Survey. I recommend considering replacing the Standard Classification of Transported Goods (SCTG) with the North American Product Classification System (NAPCS), or a variant thereof.

NAPCS is already the basis for collecting product data in other Census Bureau surveys, including the Economic Census and the Annual Integrated Economic Survey (AIES). NAPCS broadlines are also used in the Manufacturing and International Trade Report (MITR) to correspond with the Harmonized System (HS).

The Census Bureau has a sophisticated data collection instrument to guide respondents on selecting appropriate NAPCS classes. CFS could leverage this existing technology, rather than maintain a separate machine learning model (e.g., CFSML).

Classifying transported commodities using NAPCS will also facilitate blending of CFS data with other output data collected on a NAPCS basis. One example is BEA's estimation of transportation margins for the Input-Output accounts which relies on CFS data and NAPCS-based product line receipts data from the Economic Census.

Maintaining multiple product classification systems is burdensome, costly, and hinders analysis across surveys. Like SCTG, NAPCS is shared with Canada. Outreach to Statistics Canada should be made to assess its interest in using NAPCS for its corresponding surveys of transported goods. The continued business need for SCTG should be evaluated in these contexts.

SCTG's origins link to the Standard Industrial Classification which was last updated in 1987. This iteration of the CFS offers an opportunity to modernize its classification methodology, reduce data collection costs by using existing tools, and enhance its utility to data users.

Thank you for the opportunity to comment.

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* These comments are furnished in my personal capacity and do not represent an official view of the Bureau of Labor Statistics or the ECPC.