Attachment M

Department of Commerce
United States Census Bureau
OMB Information Collection Request
Annual Integrated Economic Survey
OMB Control Number 0607-1024

30-Day Notice Comments Received

Public Comments for ICR 202601-0607-002

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Comments Received :

I am pleased to submit this letter in response to the Census Bureau's request for comments on its information collection request (ICR) for the 2025 Annual Integrated Economic Survey (AIES), as invited by a Federal Register notice of January 20, 2026 (91 FR 2330).

I write to jprovide enthusiastic support for OMB clearance of the 2025 AIES. In my view, the availability of reliable data from the 2025 AIES is essential for enabling intelligent, informed public and private decision-making. As a consequence, the 2025 AIES can be seen as a critical asset to American economic security. To facilitate its fulfilling this role, I offer two proposed terms of clearance for OMB consideration, as follows:

1) "Within three months of clearance, the Census Bureau shall provide OMB with a four-column multi-page table in landscape format that succinctly provides information regarding the importance of each of the uses of the AIES identified in Sections 2 and 4 of Supporting Statement A. Use categories would be laid out in rows. Column headings would include use category; three or four sentences describing the nature and importance of the use; an order-of-magnitude description of the economic importance of the category decisions informed by AIES data; and an order-of-magnitude description of the economic impacts of an AIES with unreliable data."

I suggest this term of clearance as I view the current text in Sections 2 and 4 as not adequately providing information on the magnitude of the economic importance of the AIES and of the negative consequences of unreliable AIES, information necessary for OIRA to fully understand the relationships between projected respondent burden and projected economic value.

2) "Within nine months of clearance, the Census Bureau shall provide OMB with a report that includes a) the results of a comparison of annual economic data (establishments, employment, earnings) by NAICS code in the Business Register with in the LEHD Employer Characteristics File (ECF) [https://lehd.ces.census.gov/data/lehd-snapshot-doc/latest/sections/employer_level/ecf.html]
for the years 2015-2024, b) a description of trends in the discrepancy between BR and ECF estimates over time, c) an assessment of the impact of the Census Bureau's recent efforts to increase NAICS classification accuracy on the trend, and d) implications for future efforts to further increase classification accuracy.

As noted in my previous comments to OMB on the AIES, issues regarding NAICS classification accuracy (as identified by the Census Bureau) suggest an undesirable gap between current and desired reliability of the AIES. In response, OMB has approved terms of clearance directing the Census Bureau to report on its efforts to improve NAICS classification accuracy, which it has laudably carried out. I recently became aware that the Census Bureau LEHD Program's employer files are NAICS-classified by the BLS. While recognizing that Census and BLS criteria for classification differ for good reasons (as described by Census to OMB in a previous ICR), a comparison of the two sets of economic data by NAICS code over time would aid understanding of trends in Census NAICS classification relative to BLS classification.

For OMB's information as it considers my suggestion, I have attached a comparison of Census County Business Patterns data and BLS QCEW data by select NAICS codes.

I appreciate the opportunity to provide comments on the AIES and look forward to OMB's response.

BLS vs. Census Estimates of Employment & Establishments in Select Industries, U.S., 2021-2023

		Bureau of Labor Statistics Quarterly Census of Employment & Wages (QCEW)					Census Bureau County Business Patterns				
					2-Yr Change					2-Yr Change	
Key Industry	**Variable**	2021	2022	2023	#	%	2021	2022	2023	#	%
R&D in Physical, Engineering, & Life Sciences	Employment	759,594	821,513	855,226	95,632	12.6%	827,379	902,939	957,341	129,962	15.7%
	Establishments	37,288	44,526	49,519	12,231	32.8%	19,234	20,072	20,321	1,087	5.7%
NAICS 54171								% QCEW			
	Employment						108.9%	109.9%	111.9%		
	Establishments						51.6%	45.1%	41.0%		
Pharmaceutical Mfg	Employment	331,848	344,051	346,575	14,727	4.4%	301,246	314,242	321,068	19,822	6.6%
NAICS 3254	Establishments	5,960	6,782	7,316	1,356	22.8%	2,867	2,882	2,905	38	1.3%
								% QCEW			
	Employment						90.8%	91.3%	92.6%		
	Establishments						48.1%	42.5%	39.7%		
Semiconductor Mfg	Employment	187,180	199,367	203,618	16,438	8.8%	95,446	108,559	116,831	21,385	22.4%
NAICS 334413	Establishments	1,980	2,178	2,423	443	22.4%	781	791	822	41	5.2%
								% QCEW			
	Employment						51.0%	54.5%	57.4%		
	Establishments						39.4%	36.3%	33.9%		
Iron & Steel Mills & Ferroalloy Mfg	Employment	79,767	83,151	84,660	4,893	6.1%	81,394	79,317	78,532	(2,862)	-3.5%
	Establishments	928	957	1,006	78	8.4%	398	314	359	(39)	-9.8%
NAICS 331110								% QCEW			
	Employment						102.0%	95.4%	92.8%		
	Establishments						41.6%	31.2%	35.7%		
Storage Battery Mfg	Employment	36,986	**45,618**	**51,896**	14,910	40.3%	21,958	24,322	32,169	10,211	46.5%
2017 NAICS 335911	Establishments	321	**589**	**725**	404	125.9%	180	210	229	49	27.2%
2022 NAICS 335910		[2017	**[2022 NAICS]**					% QCEW			
	Employment	NAICS]					59.4%	53.3%	62.0%		
	Establishments						56.1%	35.7%	31.6%		
Turbine & Turbine Generator Set Units Mfg	Employment	20,148	17,335	18,190	(1,958)	-9.7%	28,054	28,061	25,748	(2,306)	-8.2%
	Establishments	371	400	420	49	13.2%	203	208	199	(4)	-2.0%
NAICS 333611								% QCEW			
	Employment						139.2%	161.9%	141.6%		
	Establishments						54.7%	52.0%	47.4%		

Note: QCEW figures are annual averages of monthly figures. County Business Patterns figures are for week of March 12. Industry classifications are per 2017 NAICS, except for QCEW for 2022-2023, which is per 2022 NAICS. For all but storage battery manufacturing, 2022 NAICS coverage same as 2017 NAICS.
Prepared by Andrew Reamer, Research Professor, GWIPP, George Washington University

Semiconductor Manufacturing (NAICS 334413), Nation & States, 2023

Establishments, Employment, Wages -- BLS QCEW v. Census CBP

	BLS: QCEW			Census: County Business Patterns			CBP as % of QCEW		
Geographic Area	Annual Establish-ments	Avg Annual Employment	Total Annual Wages ($1,000)	Establish-ments	Employees (March 12 week)	Annual payroll ($1,000)	Establish-ments	Employ-ment	Payroll
United States	2,423	203,618	41,003,904	822	116,831	16,028,216	34%	57%	39%
Alabama	20	17	2,556	4	63	23,712	20%	371%	928%
Alaska	2	-	-	-	-	-	-	-	-
Arizona	96	22,190	3,516,054	40	12,141	1,725,735	42%	55%	49%
Arkansas	7	196	18,578	-	-	-	-	-	-
California	660	45,740	17,581,002	280	14,418	1,949,897	42%	32%	11%
Colorado	34	2,343	282,072	23	3,451	307,082	68%	147%	109%
Connecticut	17	-	-	7	231	35,905	41%	-	-
DC	3	-	-	-	-	-	-	-	-
Delaware	2	-	-	5	18	2,611	250%	-	-
Florida	143	9,149	1,180,762	30	1,203	171,441	21%	13%	15%
Georgia	34	210	58,265	6	44	4,335	18%	21%	7%
Hawaii	2	-	-	-	-	-	-	-	-
Idaho	48	6,622	1,037,559	8	6,106	866,156	17%	92%	83%
Illinois	80	347	44,327	13	165	44,158	16%	48%	100%
Indiana	16	54	5,601	7	45	4,232	44%	83%	76%
Iowa	5	-	-	-	-	-	0%	-	-
Kansas	10	-	-	4	11	1,048	40%	-	-
Kentucky	25	155	20,315	-	-	-	-	-	-
Louisiana	5	-	-	-	-	-	-	-	-
Maine	3	-	-	3	690	84,246	100%	-	-
Maryland	26	318	36,752	3	92	10,085	12%	29%	27%
Massachusetts	72	8,324	1,434,821	38	4,911	505,191	53%	59%	35%
Michigan	71	881	149,394	11	405	27,408	15%	46%	18%
Minnesota	43	2,444	316,795	21	2,580	247,248	49%	106%	78%
Mississippi	1	-	-	-	-	-	-	-	-
Missouri	40	927	83,530	4	517	49,051	10%	56%	59%
Montana	9	63	5,732	3	50	3,282	33%	79%	57%
Nebraska	2	-	-	-	-	-	-	-	-
Nevada	7	134	12,866	4	24	1,693	57%	18%	13%
New Hampshire	16	879	165,962	12	333	30,926	75%	38%	19%
New Jersey	63	2,409	241,944	23	1,149	113,739	37%	48%	47%
New Mexico	24	3,384	389,931	9	3,023	349,946	38%	89%	90%
New York	101	7,671	1,031,454	38	5,835	899,658	38%	76%	87%
North Carolina	52	6,058	757,212	13	7,031	1,003,517	25%	116%	133%
North Dakota	2	-	-	-	-	-	-	-	-
Ohio	27	4,141	363,756	8	2,133	182,644	30%	52%	50%
Oklahoma	5	-	-	4	55	2,171	80%	-	-
Oregon	111	30,371	4,964,229	35	20,322	3,023,939	32%	67%	61%
Pennsylvania	29	1,873	231,538	17	814	59,416	59%	43%	26%
Puerto Rico	2	-	-	-	-	-	-	-	-
Rhode Island	13	228	25,855	-	-	-	-	-	-
South Carolina	38	121	20,107	-	-	-	-	-	-
South Dakota	4	-	-	-	-	-	-	-	-
Tennessee	24	85	5,760	5	29	2,611	21%	34%	45%
Texas	265	34,374	5,639,589	96	20,758	2,952,281	36%	60%	52%
Utah	33	1,372	181,589	5	1,027	157,302	15%	75%	87%
Vermont	7	-	-	-	-	-	-	-	-
Virginia	52	-	-	7	1,605	185,320	13%	-	-
Washington	67	4,159	513,837	20	3,426	809,144	30%	82%	157%
West Virginia	3			-	-	-	-	-	-
Wisconsin	8	-	-	5	24	1,767	63%	-	-
Wyoming	-	-	-	-	-	-	-	-	-

Sources: Quarterly Census of Employment and Wages, BLS; County Business Patterns, Census Bureau

Prepared by Andrew Reamer, Research Professor, GWIPP, George Washington University

Semiconductor Machinery Manufacturing (NAICS 333242), Nation & States, 2023										
Establishments, Employment, Wages -- BLS QCEW v. Census CBP										
	BLS: QCEW			Census: County Business Patterns			CBP as % of QCEW			
Geographic Area	Annual Establi sh-ments	Avg Annual Employme nt	Total Annual Wages ($1,000)	Establi sh-ments	Employe es (March 12 week)	Annual payroll ($1,000)	Establi sh-ments	Emplo y-ment	Payroll	
United States	383	29,724	5,219,542	170	28,799	4,343,190	44%	97%	83%	
Alabama	1	-	-	-	-	-	-	-	-	
Arizona	19	1,593	246,803	13	471	27,637	68%	30%	11%	
California	147	14,160	3,140,821	70	9,839	2,217,940	48%	69%	71%	
Colorado	4	48	3,782	4	43	4,627	100%	90%	122%	
Connecticut	6	-	-	4	1,735	208,034	67%	-	-	
Florida	17	292	24,554	5	458	43,147	29%	157%	176%	
Georgia	4	-	-	-	-	-	-	-	-	
Idaho	12	-	-	3	338	23,153	25%	-	-	
Illinois	7	24	4,496	-	-	-	-	-	-	
Kentucky	4	5	924	-	-	-	-	-	-	
Maryland	4	25	2,861	-	-	-	-	-	-	
Massachusetts	15	3,766	540,150	9	3,359	410,190	60%	89%	76%	
Michigan	7	14	2,989	-	-	-	-	-	-	
Minnesota	5	231	28,977	-	-	-	-	-	-	
Missouri	5	-	-	-	-	-	-	-	-	
Montana	4	-	-	-	-	-	-	-	-	
New Hampshire	4	76	5,852	-	-	-	-	-	-	
New Jersey	8	108	15,684	3	61	6,414	38%	56%	41%	
New York	20	983	146,269	7	533	52,796	35%	54%	36%	
North Carolina	1	-	-	-	-	-	-	-	-	
Ohio	4	78	8,053	-	-	-	-	-	-	
Oregon	22	3,913	514,420	8	3,970	480,547	36%	101%	93%	
Pennsylvania	9	598	76,351	7	706	71,196	78%	118%	93%	
South Carolina	3	-	-							
Tennessee	6	34	3,228	-	-	-	-	-	-	
Texas	36	1,140	153,120	19	5,323	609,628	53%	467%	398%	
Utah	7	13	1,142	-	-	-	-	-	-	
Vermont	1	-	-	-	-	-	-	-	-	
Virginia	6	33	6,710	-	-	-	-	-	-	
Sources: Quarterly Census of Employment and Wages, BLS; County Business Patterns, Census Bureau										
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