

CPS was made during the summer of 1966. This decision, originating in the BLS, was considered by an interagency technical group, and by the Policy Committee on the Current Population Survey, augmented for the occasion by representatives of all major Federal agency users of the data. This was an important decision and required nearly four years after the publication of the Gordon Committee recommendations. During all this time and with all these formal and informal consultations, we received no comments or requests for hearings from any person or organization other than direct replies to requests for views.

One part of the final change in definitions, that to raise the lower limit of the official labor force count from 14 years to 16 years, had not been a part of the original Gordon Committee recommendations. This question had, however, been thoroughly discussed by the interagency groups mentioned, and had been recommended to the Gordon Committee by many of the persons that Committee consulted, particularly representatives of the business community.

I have described this experience at some length because I believe it is typical of the work that is undertaken when major changes in definition are reviewed.

Q. 4. "Have there been attempts to measure the burden to respondents in complying with requests for information? Is this burden equitably distributed?"

A. 4. Since 1964 the Office of Statistical Standards has routinely required that any proposal for a new or revised report shall include an estimate in manhours of the time required by respondents to complete the report. For repetitive reports this estimate is expressed in manhours per year. During 1965 similar estimates were entered into the records for the entire existing inventory of repetitive reports.

These estimates are used, first, in weighing the costs of a proposed report against its benefits, and also in statistical compilations showing the distribution of the reporting effort required by Federal reports by types of reports, types of respondents, and agencies. They lend themselves to additional types of analysis which we have not yet had time or resources to develop.

These estimates of reporting time, by their very nature, can be no more than rough approximations and must be used with care. There are difficult conceptual problems in the measurement of reporting effort, and for any given report the time required (however measured) may vary widely from respondent to respondent or for the same respondent according to whether it is a new or a well established report. The total burden entailed by a report is as much a function of the volume of usage as it is of the inherent difficulty of the report. Even a very simple report may, by reason of frequency of filing by a large number of respondents, give rise to a large total "burden"; and total burden may vary widely from time to time (e.g., as in changing participation in a benefit program requiring applications and reports, or the changing volume of foreign trade requiring documentation). We have refrained from compounding the burden imposed by a report by requiring precise measurement of the burden itself. We ask the agency to estimate, with no more than limited consultation with respondents, the time required by a "typical" respondent. This is multiplied by the estimated number of responses to give a total.

Our analysis of these figures to date permits only very broad generalizations. They exclude tax reports since such reports are not subject