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The Honorable Hilda Solis
Secretary of Labor
200 Constitution Avenue NW
Washington, DC 20210

Dear Secretary Solis:

We are writing to invite your reconsideration of the BLS International Labor Comparisons (ILC) program which is again listed for termination in the President's FY-2013 budget. This is the third year that this unique international data program has been recommended for termination; it is also the third time that the Office of Management and Budget has noted in the "Cuts, Consolidations, and Savings" document (page 18) that the ILC program "produces articles, technical papers, or special reports that are not widely used." They are indeed widely used because they do not exist anywhere else. Labor market data for individual countries available from international organizations are not comparable because only BLS adjusts the data from other countries to ensure an apples-to-apples comparison.

In order to assess the usage of the BLS International Labor Comparisons program, we requested the enclosed web hits data from BLS for calendar years 2009 and 2011. BLS indicates that "these are raw counts of numbers of hits and are not necessarily indicative of the number of users visiting the web site." Nonetheless, they provide one quantifiable way of comparing customer usage on the Internet across BLS programs. The following points are evident based on the data for the two years:

- ILC web hits rose from 1.5 million in 2009 to 1.9 million in 2011. These figures translate into roughly 4,000 to over 5,000 hits every day of each year.
- ILC hits are well ahead of some of the more well-funded BLS surveys or programs, namely the National Longitudinal Survey; the American Time Use Survey; the Job Openings and Labor Turnover Survey; the Mass Layoff Statistics; the Quarterly Census of Employment and Wages; the Productivity and Costs program; and the International Price Program, to cite some examples.
- Given its small budget (about \$2-million annually), ILC's cost-effectiveness relative to other BLS programs paints even a rosier picture for keeping it.

These widely-used data are produced by a very small staff that has suffered attrition over the past three years. In contrast, some of the programs with fewer hits are much more costly and employ much larger staffs.

In 2010, a group of ILC supporters (including two of the undersigned) posted an online petition favoring the retention of the ILC program. The petition has been signed by almost 300 people, including labor union leaders, representatives of the business community, economists, other researchers, and representatives of other data-producing organizations. Some of the data-producing organizations use ILC data to help them produce their data, while others disseminate ILC data along with their own.

We believe that the response to this petition, and the prominence of some of the signatories, is additional support for our belief that the ILC data are in fact widely used and are used by influential people. The petition can be viewed at <http://www.ipetitions.com/petition/saveilc/>.

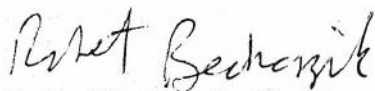
We should let you know that all three of us have, at some point in our careers, worked for BLS, and that two of us have had some responsibility for the ILC program.

We would like to know if DOL management considered the web hits data in making the decision to terminate ILC in the President's budgets? Were any other metrics used to reach the decision to terminate this valuable program?

Your response to these two questions would be greatly appreciated. You may send your reply to Robert Bednarzik at the Georgetown University address at the head of this letter.

We are sending a similar letter to the Honorable Jeffrey Zients, Acting Director, Office of Management and Budget.

Sincerely yours,



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Enclosures: BLS web hits data for CY 2009 and 2011
Ccc: John Galvin, Acting Commissioner, BLS