INTRODUCTION

PROPERTY TAXES AND THE UNDERLYING
assessment of real estate have never been
popular in the United States, despite always
being important to the financing of U.S. local gov-
ernment. For the past 20 years, property taxes have
been about 30 percent of general state and local tax
collections, and much higher proportions of just
local finance. As of the close of June, 2008, annual
property tax collections were $404.5 billion—more
than state and local sales and use tax collections
and more than state and local individual income
tax collections.

While the property tax has remained sizeable and
unpopular, we know far less today on a systematic
basis through publicly funded statistical agencies
about the details of it than we used to. Since 1987,
the Governments Division of the U.S. Bureau of
the Census has not collected and published state-
by-state descriptions of the legal and institutional
environment surrounding the collection of the
property tax, and since 1982 not collected and
published statistics on local taxable property values
or sales price ratios. The latter were begun initially
as a series of special studies in the 1940s, and later
as an integral part of its quinquennial Census of
Governments over the period 1957-82.

The elimination of the taxable property value
studies was noted by myself and 18 other members
of the Committee on Property Taxation of the
National Tax Association in 1999 through a group
letter to the Census Bureau requesting reinstatement.
However, then Census Bureau Director Ken
Prewitt and subsequent directors have declined to
reinstate the taxable property values measurement
and report. During its deliberations in 2007, the
National Research Council Panel on state and local
statistics was told that reinstating the taxable prop-
erty values report would cost $26 million, or more
than the Governments Division’s overall budget.
While the Panel was acutely aware of the tight
budgetary environment facing the Census Bureau
generally, and the Governments Division which
resides within the Economic Directorate, the Panel
recommended that the Division investigate “...a program of research and testing to explore
conceptually sound and cost-effective means of
collecting these data.”

It should be noted that the Census Bureau’s
budget has become even tighter since the release of
our panel report in the fall of 2007, largely
because the cost of the decennial census has risen
dramatically. While it is beyond the scope of
this paper to do a cost-effectiveness analysis of
spending $11.3 billion in 2010 to measure about
305 million Americans compared to spending $26
million to measure the taxable values of perhaps
100 million taxable properties owned in the United
States, the difference between investing scarce
statistical budgets at rates of $37/person and $.26/taxable parcel or 142:1 is striking.

ACTIVITIES OF THE GOVERNMENTS DIVISION
RELATED TO REAL ESTATE TAXATION

The Governments Division collects a wide
variety of data on the federal government, the
states and their general, single function local
governments and authorities. Revenues includ-
ing property tax collections, expenditures and
state and local employment are measured on a
quarterly basis as are the finances of major public
employee retirement systems. Every five years,
enumeration of spending and revenues of all
state and local governments occurs through the
Census of Governments. For its quarterly and
annual collection efforts, the Division relies on
sampling of major general governments and spe-
cial districts, and the enumeration of the finances
of all independent and dependent school districts
for the National Center for Educational Statistics.
Data for its quarterly survey of property tax col-
clections, Form F71, is obtained electronically
through a controlled Web site and through postal
mailings.

Beginning in 1987, the sample design of the
annual finance and employment surveys has been
focused on achieving reliable estimates of key
indicators at the state level, but not for every county
area in the United States. Note that national and
state and local quarterly estimates of property tax
collections have been continuously collected and
The Framework of the Governments Division 1982
Taxable Property Values Study

The 1982 Taxable Property Values and Assessment Sales Price Ratios (TPV, U.S. Census Bureau, 1984) presented a wide variety of state, metropolitan, and local information that can be roughly divided into three categories, and are summarized as follows:

- **Legal Framework:** A detailed state-by-state review of state assessment statutes and assessment administration dealing with realty and tangible personal property, and a detailed state-by-state review of mechanisms to provide preferential treatment through classification, exemption, exclusion, and preferential rates;¹⁴

- **Property Stock Measurements:** Measurement of the gross and net assessed value of realty at the state, regions and metropolitan areas, and local level; measurement of realty by type of use and tax status; measurement of property tax collections;¹⁵

- **Property Flow and Assessment Uniformity:** Measurement of real property sales activity during a 6-month period in 1981; state, regional and selected local area measurement of median assessment (A) to sales price (V) ratios (A/V); development of estimated fair market values across states, state, regional and selected local area measurement of the variability of A/V through the reporting of coefficients of dispersion of single-family non-farm properties and price-related differentials; and tallying of various financing schemes (fixed, variable rate mortgages, points to buyer etc.) associated with each transaction.¹⁶

Much of the resulting 28 tables could be compared to prior taxable property value studies. We learned, for example, that total gross assessed value of real and personal property grew from $280.2 billion in 1956 to $2,958.2 billion in 1981 for the continental United States, while total net assessed value grew from $272.2 billion in 1956 to $2,837.5 billion in 1981.¹⁷ The number of parcels grew from 61 million in 1956 to 98.4 million in 1981. Across this period, acreage and farms declined from 23.2 percent of total parcels to 15 percent of total parcels.¹⁸ Equally valuable to those interested in the evolution of assessment standards and practices was the historical commentary that informed on such topics as the growth of classification, assessment organization, and administration.

Unlike state and local individual income taxation, which largely relies on the Internal Revenue Code and extensive information sharing between state revenue agencies and the Internal Revenue Service, state real and personal property assessment and taxation laws and practices are heterogeneous and do not benefit from a comparable federal tax. Thus, the development of meaningful interstate and inter-area comparisons of assessed values on a comparable, fair market value basis requires significant care to ensure that apples-to-apples comparisons are actually accomplished. TPV admirably documented its definitions and classifications, methodology, and the statistical reliability of its sample estimates.

Perhaps the most difficult, controversial and important task performed by TPV has been the comparison of assessed value (A) to recent arms length sales price (V) of representative samples of all types¹⁹ of locally assessed properties. Utilizing a two-stage sampling procedure that ensured that sales price was compared to a prior assessment, the Governments Division measured A/V for states, Standard Metropolitan Statistical Areas (SMSAs), counties, and relatively populous minor civil divisions. In areas with no electronic records, Census field enumerators went into local county assessment and title offices and used sampling schemes to obtain samples of transactions that reliably reflected the size distribution of values. However, in no event were data on residential properties with sales prices over $3 million collected.

The measured variation in assessment uniformity was remarkable and perhaps discomforting. For example, here in Pennsylvania, one finds that in 1981 the City of Philadelphia, PA had 537,400 parcels with a gross assessed value of $5.855 billion, a median A/V of 26.2 percent and a coefficient of dispersion of 59.1²⁰ Allegheny County, PA with 483,467 parcels and a gross assessed value of $5.634 billion, had a median assessment ratio of 21.4 percent, and a coefficient of dispersion of 38.2.²¹ Both dispersion coefficients were
well beyond the best practice recommendation of 20.0 by the International Association of Assessing Officers and both independently measured assessment ratios were considerably lower than those adopted statutorily.

This measurement of assessed value and sales price remains difficult because not all states and localities conform to the simple idea of a county or township assessor who assesses for county, municipal, and school real estate tax purposes. In 1982, the District of Columbia and 30 states fit into this simplified category; however the others were more complex because either more than one assessor performed assessments for a particular area, and/or the assessed values reflected material adjustments due to classification, exemption, differential assessment, and/or tax rates. TPV accomplished comparable measurement by using the officially determined assessed value before deductions of any exemptions used for official tax determination purposes.

While consistent measurement of sales ratios and their uniformity within and across the states is difficult and time consuming, their independent measurement by Census, which has the statutory authority to request cooperation both from governmental units and parties transacting real property, has had a number of uses. It has permitted the independent check on the efficacy of state efforts to equalize the burden of property taxation, has determined the extent to which state-by-state assessment standards are being met, and independently checked on the accuracy of mass appraisal reassessments. Such ratios can also be material in the practical application of taxpayer appeals, and have standing in legal proceedings. Historically, the presentation of reliable data on sales ratios across states and metropolitan areas conveyed important interjurisdictional information to tax administrators and elected officials on the underlying fairness of real estate taxes to fund local services.

The practical application of the TPV measurement methodology entailed utilization of local electronic records on assessments from local assessing offices, and utilization of electronic records on arms-length transactions from deed transfer and transfer tax records. In some states, the transfer of ownership triggers application of an excise tax on the value of the transaction, and typically is subject to disclosure and often an affidavit from the buyer as to what was paid.

**STRATEGIES FOR IMPROVING OUR KNOWLEDGE OF ASSESSED VALUES, SALES RATIOS, AND THEIR VARIABILITY: GOVERNMENTAL AND THIRD PARTY ELECTRONIC SOURCES AND ISSUES**

Estimating the value of real and personal property is of interest beyond those curious about federal statistics. Indeed, one can argue that the current financial crisis in world capital markets is due to unrealistic appraisals of real estate that were created to underpin or justify the lending of mortgages and the development of fees for mortgage placements. Private (for profit lending institutions) institutions such as Fannie Mae and Freddie MAC, which were supposed to assist low-income home owners and increase the liquidity of the mortgage market; and federal institutions such as the Federal Housing Authority, which were also supposed to assist low-income home owners, have all been involved in devising and using various models that predict on the basis of sales prices and physical characteristics the underlying value of real estate. Such appraisal models have much in common with those used for Computer Assisted Mass Appraisal (CAMA), typically utilized in reassessment. Of course, appraisal to support a loan application is different in character than appraisal for the creation of an assessed value for tax administration purposes. The former serves the interest of the buyer/owner and the latter is a disadvantage to the buyer/owner because it directly affects the buyer/owner’s tax bill.

Independent ratio studies can analyze assessment performance, evaluate CAMA models and identify shortcomings and weaknesses in current assessment practices. As is generally understood, ratio studies that are not based on representative areas, values, and types of properties can yield misleading information and lead to misdirected policy changes.

**Utilizing Existing State Sales Ratio Studies**

Dornfest and Johnson (2004) report that in 2003, fully 41 of 50 states and the District of Columbia reported performing annual sales ratio studies; this was the same number as in 1997. A central ingredient in any sales ratio study is the comparison of a disclosed arms-length sales price to historical assessed value. Three forms of disclosure are reliable: full mandatory sales price disclosure, transfer fees that are based on the sales price, and mandatory recordation of any transfer instrument. As of 2003, only Idaho, Missouri, and Texas contained
none of these three elements of disclosure. New Mexico enacted disclosure legislation in 2003. Also, Louisiana, Mississippi, and Utah continue to not require full disclosure of transfer fees. Fully 43 states use ratio studies to “advise and assist” in the assessment process, as compared to only 35 states in 1994 and 1997. Poor uniformity in assessment, as evidenced by high coefficients of dispersion, can statutorily trigger state action of some sort in 34 states, and in 23 states this can result in a statutorily permissible or required state order of reappraisal. With respect to ascertaining the level of assessment, 39 states used the weighted mean A/V in 2003, while 38 states used the median A/V. With respect to trimming the distribution of A/V prior to measuring the representative A/V, 35 states indicate testing for outliers and 10 states indicate explicit limitations on the number of outliers that may be tossed out.

Given this abundance of state sales ratio studies, perhaps the easiest and most inexpensive way to begin to reinstate TPV would be to collect, classify, and report the results of these ratio studies for a given year, and attempt to put them on a comparable basis. Historically, this characterization and tabulation of state ratio study efforts had been done by the Governments Division in conjunction with preparing its TPV.

Expanding the Partnership with the National Center for Educational Statistics

If the Census Bureau prefers reviewing actual administrative records of assessments, tax collections, and transactions to simply reinterpret state sales ratio studies, there are a number approaches that it could take in connecting to existing flows of administrative information. Virtually all but a handful of independent school districts in the United States utilize the real property tax to finance themselves, and all are involved in providing annual property tax collection information/data to the Governments Division, which collects it on behalf of the National Center for Education Statistics of the U.S. Department of Education. In particular, Form F-33, Part 1, Section A Line 1 elicits “Property taxes.” This collection effort is historical, ongoing, and NCES is a large, well funded statistical agency that routinely studies school finance. Since property tax collection is inherently based on the measurement of assessments and the application of exemption or tax forgiveness schemes to move from assessed to taxable values to tax collections, it follows that every school district in the United States, which covers the entire geography of the United States, knows its property tax base and, either through its own, contracted, or delegated agent, has a set of tax roll records that must include underlying assessment records.

What I thus have in mind here is adding to Form F-33, the annual survey of school systems, two additional lines: “Gross Assessed Value” and another for “Gross Assessed Value of Taxable Properties.” The instruction’s portion of the form would require a few sentences to define these terms.

From a data collection perspective, this means that with some relatively minor adjustment to current survey forms, data on the assessed and taxable values of real property in the United States could be readily collected on an annual basis at little added expense. It is likely that for most school districts, such data could also indicate the totals by use of the property.

As those who study governmental accounting rules know, NCES is the standard setter for school district accounting. Heterogeneity in definitions of property use, classification, and nomenclature surrounding types of property exemption schemes could be the subject of NCES consideration and pronouncements over time so that local assessed base measurement could be more systematic and comparable across states. Whether or not NCES could accomplish such changes in data collection and survey forms by adding to its measurement of school finances characteristics of the school finance property tax base without statutory or regulatory changes is an open question. It is likely that the change in survey form and associated instructions would require OMB approval. Under this approach, most of the collection cost would be borne by respondent school districts rather than by Census field data collectors.

Utilizing school districts as data collection sources does not directly address how sales and arms-length price information could be obtained and transmitted. Since school districts do not maintain deed records and may not share in transfer tax proceeds, they may not have readily available sales and price information on an individual, parcel-by-parcel basis. It may be feasible, however, for each school district to report the aggregate value of new construction as reflected in the sales prices of land and improvements in a calendar year, and it may be feasible for each school district to report the aggre-
gate value of all sales and the aggregate value of their gross assessments of taxable properties. From such aggregate information, one could construct the ratio of total assessed value to total sales value and measure an overall average sales ratio.

Federal Administrative Records to Measure Sales and Market Values

The federal government is involved in real estate transactions in several different ways: through federal taxation of income derived from the sale or exchange of real estate, and through various kinds of regulatory roles in the settlement and mortgage financing process. Unfortunately, none of these mechanisms currently provides information which the Census Bureau could readily utilize to estate gross or net assessed values, taxable values, or the variation in the ratio of assessed value to sales price.

Since the early 1970s, the Internal Revenue Service has been statutorily obligated each year to provide to the U.S. Census Bureau the universe file of individual income tax returns or IMF. Census uses this tax return information for the construction of population and income estimates for small areas and also to measure migration. County-to-county migration data are available to researchers through the Statistics of Income Division of the IRS and have been used for years by demographers and others who want to follow population and income movements.

Historically, sellers of real property have been required for federal tax purposes to report gross proceeds from the sale or exchange of land, permanent structures, condominium unit including permanent improvements or stock in a cooperative housing corporation. Currently, Census does not receive the full 1099-S, and the 1099-S does not require the reporting of the location of property, its use, assessed or taxable value. Recently, transactions involving sale or exchange of principal residence for $250,000 or less (($500,000 or less for married filing jointly) need not be reported. Thus, even if the 1099-S were revised to collect location and parcel id information, because it does not reflect the assessed value, a statistical agency would not be able to readily derive A/V for properties sold state by state.

The HUD-1 settlement statement that accompanies all residential real estate transactions would appear to be another administrative form of interest, because it contains the date, property description, and details of what the buyer and seller transact in terms of cash and other considerations. It has, however, several limitations. First, HUD-1 is not put into machine readable form in its entirety. Second, information about annual real estate gross and net assessment are not recorded, although escrow amounts for monthly taxes due are measured and can be readily annualized. Accordingly, for these forms to become useful electronic information, HUD would have to commit to first alter their form to contain the information that would then feed into TPV, and then HUD would have to invest in putting all the information on the settlement form into a database. Even if these two steps were taken, there would still not be any information about the non-residential sectors of the real estate markets.

The FHA database is informative about sales prices; however, it is confined to the low end of the residential housing market.

Third Party Data Sources on Tax Rolls and Deed Transfers

As noted earlier, banks and other financial institutions have an interest in not only the price at which a property they are financing transacts, but also the taxes currently being levied on the property and its assessed value. Carrying costs of residential property involves the sum of the mortgage, insurance and taxes, and these are considered when reviewing the loan application in conjunction with the financial position of the buyer/borrower. Assessed values are of interest not only for tax determination purposes but also as checks on the appraisals that typically accompany the determination of loan amount.

The need for such information in reliable form has led to the long standing development of real estate data brokers who buy, process, and sell such information and related real estate services to lending institutions. Many of these data brokers are subsidiaries of regional and national title companies that historically have performed title searches in conjunction with the due diligence required in settling a real estate transaction. Related to such original data collection services is a group of organizations which process and model the resulting data.

One of the largest real estate data brokers is First American Corporation of California which provides title and settlement services, mortgage services, appraisal and valuation services, screen-
ing and risk mitigation, property and ownership information, analytics and modeling, insurance and home warrant information, and investment management. Once a county abstract company, First American is now a Fortune 500, and has a subsidiary, CoreLogic, which is devoted entirely to the collection and sale of real estate information. Real estate data brokers routinely collect electronically and also capture paper records and put in electronic form information maintained on tax rolls, and information maintained in deed offices through out the United States. First American is one of several vendors that Fannie Mae utilizes in the construction of their residential valuation models which are resold to many commercial lending institutions.

The basic idea here is to either directly purchase the U.S. real estate data base of tax, assessment and sales information and construct a TPV analysis state by state, or purchase the use of such data from a third-party processor of databases. Unlike the earlier suggestions of relying on state-by-state sales ratio studies or obtaining simple information via school districts, the research project here would be to forego the historical Census field investigation of tax roll offices and deed offices, and simply use what electronic information is available.

The immediate question that arises, given that some states and parts of states are “non-disclosure” states, is how much of the U.S. property inventory could be covered from such sources. By examining the extent of county area coverage of property tax and deed transfer offices by state by First American and Core Logic, we can answer this question.

Overall, 58 percent (about 1,800) of the county areas in the United States are covered by First American in terms of tax rolls, and 34 percent (about 1,100) of the county areas are covered in terms of deed transfer offices. However, when we weight this county coverage by county population, we find that 88 percent of the U.S. population are accounted for by these county tax offices, and 80 percent of the U.S. population are accounted for by these deed transfer offices. If we instead weight by 2002 county area taxes (county government + all municipal + all school and all other property taxes) available from the Census Bureau, we find that 91 percent of total U.S. local property taxes are accounted for by these tax roll offices, and 87 percent of total U.S. local property taxes are accounted for by these deed transfer offices. First American coverage will be incomplete in the rural parts of a number of states but still cover more than 75 percent of the county area property taxes in most states. Coverage of certain kinds of uses, primarily agricultural, would, however, be weak. Coverage of urban areas, and commercial and industrial uses would be quite strong. Radar Logic, Inc. covers the transactions and tax rolls of only 202 county areas. However, because these are major metropolitan areas, they manage to cover 37 percent of the U.S. population in 2005-6 and 46 percent of total local property taxes in 2002. While it was beyond the scope of this paper to elicit database prices from these two commercial real estate data sources, it seems likely that each would be well below the $26 million that Census believes it would cost to recreate TPV. How much analysis and what sort of statistically reliable data would result from either approach are important follow-up issues; however, what these coverage calculations suggest to me is that one could make substantial progress in recreating a TPV in an inexpensive manner, and would wind up using far more universe information than was available in 1982 or 1987.

CONCLUDING REMARKS

With the demise of the Governments Division long-time commitment at the state and local level to measure gross assessed, net, and taxable property values, and related evidence on the uniformity of the assessment process, much has been lost of what we know about reality in the United States. Whether or not an ongoing process of independent sales ratio studies could have better informed policy makers over the last decade about the build up in property values and then its dramatic reversal is difficult to judge. What I hope this review of different ways to think about using modern sources of information about reality has accomplished is to rekindle interest, not only in the research and statistical communities, but also in the Census Bureau to work through in more detail the implications of using both existing data collection mechanisms and electronic third parties.

Certainly, as the federal government grapples with the problems associated with the rapid decline in housing values, it will itself subscribe to the various commercial data services to keep track of regional housing prices, and to determine if particular mortgage arrangements can be altered to prevent foreclosure. It would seem relatively
simple for the new federal oversight authority to partner with experts in the Governments Division to enable them to measure and report gross and net assessed values, taxable values, and to perform and report sales ratio studies.

Acknowledgments

The author benefited from comments on this paper from Henry Wulf, Rockefeller Institute of Government, Alan Dornfest of the Idaho State Tax Commission, Kurt Usowski of the U.S. Department of Housing and Urban Development, Lisa Blumerman of the U.S. Census Bureau, and Yolanda Kodrzycki of the Federal Reserve Bank of Boston. The author also wishes to thank Radar Logic of NYC and First American Real Estate for providing their coverage information in electronic form. A more complete version of this paper, with state maps that indicate electronic data coverage, is available on my Web site at: http://www.andrew.cmu.edu/user/rs9f/state_tax_notes_published_1_26_2009.pdf This paper is the sole responsibility of the author.

Notes

1 See, for example, Fisher (1996).
2 See U.S. Census Bureau, various years, Table 1.
3 The void created by the Census Bureau has been widely noted and efforts have been made to keep track of aspects of property tax administration and property tax statutes. See Dornfest and Thompson (2004), and the ambitious work of the George Washington Institute of Public Policy (2007) funded by the Lincoln Land Institute. Also, the Nelson A. Rockefeller Institute of Government has long published Governments Division data in readily accessible formats, and also collected and published timely state revenue reports. See http://www.rockinst.org/government_finance/
4 See U.S. Census Bureau (1941).
5 See Title 13, Section 161: Quinquennial Censuses; Inclusion of Certain Data of the US Code, which directed the Census Bureau to collect “…data on taxes and tax valuations…of states, counties, cities and other governmental units.” Not well known is the fact that a 1987 taxable property values and sales ratio volume was prepared in conjunction with the 1987 Census of Government, but never publicly released.
6 See National Research Council (NRC, 2007), Appendix C.
7 Over the past several years, the Governments Division’s share of the Census Bureau’s Economic Directorate, which is charged with measuring the U.S. economy, has been about 6.8 percent, although it is responsible for measuring 11 percent of public and private employment, and about 11 percent of GDP. See Recommendation 3-4 in NRC (2007, p. 7).
8 U.S. Government Accountability Office (2006) reports that the accrued cost of the 2010 Census will now be $11.3 billion or about $37/person.
9 See Table 7 U.S. Census Bureau(1984, p. 13), which reports 98.4 million taxable properties in 1982.
10 Of course, performing the decennial census responds to a constitutional obligation, while measuring taxable properties responds to only a statutory obligation in the US Code.
11 See http://harvester.census.gov/sgf/sgf171/
12 See U.S. Census Bureau (2003).
13 See U.S. Census Bureau (1984) appendices A through D, as well as E and F which contain standard definitions and survey forms and Table E at page xvi.
15 Reported sales prices were not adjusted by reported financing mechanisms.
16 See Table A, U.S. Census Bureau (1984).
17 See Table D, U.S. Census Bureau (1984).
18 Nonfarm residential property, single-family houses, acreage, vacant plotted lots, commercial and industrial property, and other and allocable. See Table 21 of U.S. Census Bureau (1984).
19 See Table 21, U.S. Census Bureau (1984, pp. 178-9).
20 See Table 21, U.S. Census Bureau (1984, p. 182-3).
21 Upon creating a sample of transactions, the TPV measurement process then elicited from either the buyer or seller, through Form GP-31, confirmation of the description of the property transferred, the size of the parcel, the use of the land and improvements, the nature of the financing associated with the transaction, and the nature of the sale (ordinary sale, foreclosure, sale between relatives, etc.).
23 See Dornfest and Thompson (2004, p. 34).
27 Given the importance of officially measured sales ratios in the property tax appeals process and the tax minimizing appellant’s interest in there being a low representative sales ratio to compare his over assessed property to, the technical details of how representative sales ratio is accomplished is of financial and therefore political importance to both parties. If outlier sales ratios on both sides of the distribution can be thrown out by the assessing agency, uniformity will be more likely, and the necessity of an uncomfortable reassessment forestalled.
28 See, for example, U.S. Census Bureau (1975, 1980).
29 It is also reasonable to presume that each local school district knows its property tax collection rate that could be collected as additional information for publication;
however, the first priority I suggest would be collecting data on gross assessed value and gross assessed value of taxable properties.

30 See www.firstam.com
31 First American was the commercial real estate data source for the Strauss and Straus (2003) study of the fairness of assessments in four urban counties.
32 These figures are based on a comparison of county-by-county coverage as reported by First American in 2004 to the author. When population weighting is used, population is from the Census Bureau’s estimates for 2005-6 as contained on the Government Division’s Web site. When property tax weight is used, property taxes refer to Census of Governments (2002) property tax collections (Item Code is “T01”) as maintained on the Governments Division Web site http://www.census.gov/govs/

References

U.S. Census Bureau.