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April 20, 2009

Susan Schechter, Chief  
American Community Survey Office  
Room 3K276, Mail Stop 7500  
Washington, DC 20233-7500

Dear Ms. Schechter:

The Mid-America Regional Council (MARC) is an association of local governments and the metropolitan planning organization (MPO) for the bi-state Kansas City metropolitan area. In its role as the MPO, and for a variety of other responsibilities and purposes, MARC relies on demographic and related data from the Census Bureau. We are very interested in the transition that the Census Bureau is making from the census long-form sample to the American Community Survey (ACS). However, we are very concerned with the detailed data that will be available through the ACS, as described in the March 6, 2009 Federal Register.

According to prior information on the ACS that we've seen from the Census Bureau itself and from other federal agencies, we have been led to believe that the data available from the ACS would be at the "county, city, and neighborhood" level, and at the "detailed long-form level of geographic detail." Based on statements such as these, we have been anticipating ACS data tabulations that would provide as much detail as prior Census products. However, the information discussed in the March 6 Federal Register notice, and particularly the restrictions on the release of data to meet disclosure requirements will seriously impact the amount of data actually available for smaller geographic area analysis.

The limitation in small area data will make it much more difficult to address significant issues that are important for the country's future progress, but which play out in decisions that must be made at a local level:

- Climate Change – to effectively address climate change, planners must have access to data that makes it possible to fully evaluate the relationship between land use patterns, demographic characteristics and transportation choices.
- Social Equity – to effectively address social equity, planners must understand the composition of the population in terms of disabilities or other mobility impairments, transit-dependent populations, households receiving temporary assistance for needy families (TANF), limited English proficiency, and environmental justice status (low incomes and minority population concentrations) and be able to relate those individuals and households to job opportunities, job access and reverse commute needs at a small geographic scale.
- Emergency Response – to ensure areas are well prepared for a range of possible emergency situations, planners must be able to identify populations that may require special assistance to evacuate or otherwise be protected from dangerous conditions, or for which communications may need to be tailored to ensure their understanding and appropriate actions in response.

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David A. Warm

- Effective Transportation – in an era of decreasing transportation funding, performance-based planning takes on greater urgency. To ensure that limited transportation resources are deployed as effectively as possible to support the nation’s economic activity, planners must have access to data that supports detailed analysis of a range of transportation options in the context of actual traveler behavior.

We are concerned that the proposed rules as detailed within the March 6, 2009 Federal Register will clearly and adversely affect the ability of our region to respond to these regional and national goals and objectives. We would encourage the Census Bureau to develop and consider additional, creative solutions that would provide data at the level of detail to support responsible planning and decision-making. In particular, we request that the Census Bureau make clear the level and cost of additional sampling to achieve the same levels of statistical reliability and data suppression as in the 2000 Census. We also request the Bureau investigate ways to use synthetic data techniques to provide the small area estimates needed without compromising data confidentiality, and report on the cost and quality of such estimates.

Sincerely,



Mell Henderson  
Director of Transportation

- cc: Sen. Kit Bond, Missouri  
Sen. Sam Brownback, Kansas  
Sen. Claire McCaskill, Missouri  
Sen. Pat Roberts, Kansas  
Rep. Emanuel Cleaver II, MO-5  
Rep. Sam Graves, MO-6  
Rep. Lynn Jenkins, KS-2  
Rep. Dennis Moore, KS-3  
Rep. Ike Skelton, MO-4



April 16, 2009

Ms. Susan Schechter  
Chief American Community Survey  
U.S. Census Bureau  
Room 3K276  
Mail Stop 7500  
Washington, DC 20233-7500

RE: *Federal Register* notice of March 6, 2009, for the Notice of Solicitation for the American Community Survey (ACS) 5-Year Data Products

Dear Susan,

This letter responds to the March 6, 2009, *Federal Register* notice requesting comments concerning the plans to 1) introduce 5-year data products in the ACS covering the period 2005 - 2009, and 2) modify the current line of data products to accommodate the 5-year data products.

The Bureau of Economic Analysis' (BEA) Regional divisions will benefit greatly from the release of the 5-year data estimates. The divisions are listed below with an explanation as to how these new estimates will improve BEA data quality.

#### **I. Regional Product Division**

(Responsible for the gross domestic product (GDP) by state, GDP by metropolitan area, and regional economic multipliers.)

Reassessing BEA economic area (BEA EA) validity is one of the major items being undertaken by the Regional Product Division (RPD). Since 1969, BEA EAs have had four rounds of redefinitions since their initiation. RPD has relied primarily on the decennial censuses of county commuting data to revise the areas. The main linking variable in delineating the EAs was commuting of the labor force in each non-nodal county.

BEA EAs define the relevant regional markets surrounding metropolitan areas. Each EA consists of a central market area and surrounding counties that are economically related to the central area. The current set, redefined in 2004, has 179 areas.

BEA EAs are widely used in government and private sectors, such as the Federal Communications Commission's use for regional airwaves licensing, the U.S. Department of Agriculture use for planning of forest and rural land uses, and the U.S. Department of Transportation's use for analysis of freight transportation. Private and academic researchers, such as the National Bureau of Economic Research or

university think tanks, also use BEA EAs for regional economic growth and industry analyses.

Because of the elimination of the long form in Census 2010, BEA needs ACS 5-year averages of commuting data by county or county-equivalents to perform the task, even though they are surveyed data. With the availability of the 5-year estimates, one of the first of the revisions will include reexamining the economic node and non-nodal counties that were economically tied to the node. The nodes consist of core based statistical areas identified by the Office of Management and Budget.

## **II. Regional Income Division**

(Responsible for annual and quarterly estimates of state personal income, and annual estimates of personal income for local areas.)

The Regional Income Division will be using the 5-year county data from the American Community Survey to develop estimates of rental income from the housing questions in the ACS, and to adjust compensation from a place-of-work basis to a place-of-residence using journey-to-work and income data from the ACS.

Specifically, the number of mobile homes and the aggregate value of owner occupied housing will be used in BEA's county estimates of rental income; and information on the place of work, the industry of work, and the wages earned will be used to generate flows of income from the place-of-work to the place-of-residence so that BEA can produce a net adjustment for residence to put the income estimates on a place-of-residence concept.

At this time, the proposed products from the 5-year estimates appear adequate for BEA purposes. However, with the release and review of these estimates, we will be able to determine if our data needs are met.

If you have any questions, please contact Ruth Bramblett, Source Data Coordinator, on 202-606-9653 or by e-mail at [Ruth.Bramblett@bea.gov](mailto:Ruth.Bramblett@bea.gov).

Sincerely,

/s/

Dennis J. Fixler  
Chief Statistician



## OKLAHOMA DEPARTMENT OF TRANSPORTATION

200 N. E. 21st Street  
Oklahoma City, OK 73105-3204

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April 17, 2009

Ms. Susan Schechter, Chief  
American Community Survey Office  
Room 3K276, Mail Stop 7500  
Washington, D.C. 20233-7500

Dear Ms. Schechter:

*The Oklahoma Department of Transportation's Planning & Research Division strongly opposes the action proposed by the US Census Bureau as noted in the March 6, 2009 Federal Register to revise the American Community Survey 5-year data planning products.*<sup>i</sup>

The U.S. Census has long been a critical data source for transportation planning and related regional transportation investment. The American Community Survey (a new census component that replaces the previous long form survey) provides the backbone of detailed data necessary for transportation planning activities required under Title 23: Highways, Part 450 – Planning and Assistance Standards. In addition to severely hindering the abilities of state and metropolitan planners to meet Federal statutes and related guidance as developed and distributed by the US Federal Highway Administration (FHWA), US Federal Transit Administration, Environmental Protection Agency (EPA), and others, the proposed changes to data available under the American Community Survey (as posted in the March 6, 2009 Federal Register) will also hurt small rural communities, low income communities, and other environmental justice populations where English is not the primary spoken language.

The American Community Survey was fully implemented in 2005 with the support of Congress and replaces the long form of the Census. Through the American Community Survey, the US Census Bureau collects, "Detailed data for socioeconomic characteristics over the course of the decade providing yearly, up-to-date information to federal users and our nation's communities." The American Community Survey also provides, "Timely, accurate information for every county, city, and neighborhood—the level where the most crucial decisions affecting American communities are made."<sup>ii</sup>

For transportation planning applications, it is understood that the 5-year American Community Survey will produce data similar to that previously provided in the Census long form. A report published by the US General Accounting Office (GAO) notes that, "According to the (Census) Bureau, the 5-year averages, which would be available at the detailed long-form level of geographic detail, would be about as accurate as the long-form data."<sup>iii</sup>

Because the American Community Survey was to serve as the replacement of long-form data, the national transportation community responded with a new set of Census Transportation Planning Products that rely on data from the 1-year, 3-year, and 5-year American Community Survey data tabulations. These data on work trip length, household income, means of travel to work, educational level, race and ethnicity information, have been used since the advancement of transportation planning in the post World War 2 interstate era, to quantitatively analyze and predict demand for transportation systems and services. Analysis is typically conducted on the basis of small geographic units that are comprised of a collection of several blocks (block group) in urban areas – that are encoded as traffic analysis zones.

*"The mission of the Oklahoma Department of Transportation is to provide a safe, economical, and effective transportation network for the people, commerce and communities of Oklahoma."*

AN EQUAL OPPORTUNITY EMPLOYER

Using this information and cross-tabulating with other census variables has allowed planners to plan accurately and efficiently for future transportation needs. Based on the best analysis possible, NO Block Group (average size: 600 people) data will be released by the Census Bureau for "Means of Transportation to Work" when it is used in a crosstab. In fact, little to no Tract level (Minimum size: 1200 people) data for "Means of Transportation to Work" data will ever make it past the proposed new rule.

It is understandable that data collected over a 3 or 5 year period will include a smaller sample size than when that data was collected 1 time every ten years. The transportation data questions were previously asked of 16 out of 100 households. So, for example, if those 16 households are now surveyed over a 5 year period, the likelihood of being able to associate the data (from the 3 households surveyed *each year* with actual individuals in dwelling units) is indeed greater. However, we are aware that statisticians and analysts at the FHWA and Census Bureau have proposed sophisticated methods of delivering useful data to the transportation planning community - while still preserving the confidentiality of individual respondents. Suppressing the data is not the best answer. The Department should allow more time for talented and capable analysts to better assess the impacts of disclosure avoidance rules and to assist the Census Bureau in developing solutions to meet the needs of the planning community.

By limiting the detailed tabulations as proposed, the American Community Survey will not, in fact, accomplish the goal noted in the March 6 Federal Register, which notes, "One Goal of the (American Community Survey) is to provide small area data similar to the data published after Census 2000, based on the long-form sample." If the posted changes to the American Community Survey take effect, Census Transportation Planning Products will provide limited value." <sup>iv</sup> To this end, AASHTO Standing Committee on Planning, with the Census Transportation Planning Products Oversight Board, has noted the following related limitations as they pertain to statewide, metropolitan, and local/ community planning, where the proposed changes to the American community Survey would:

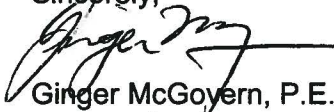
- **Prohibit metropolitan areas from meeting planning requirements detailed in 23 CFR 450.322**, where data at the traffic analysis zone and block-group levels are required. This will primarily affect analysis of journey-to-work for most tracts, block groups, and traffic analysis zones. Additionally, detailed analysis for transit routes and bicycle and pedestrian pathways will be greatly hindered, since limited data for these analyses is already limited.
- **Hinder the calibration and development of accurate travel demand models and regional transportation needs assessment.** Proposed legislation for surface transportation reauthorization, while still in draft form, will likely mandate additional monitoring and reporting across states and metropolitan regions. Limits on data availability will hamper the usefulness and development of activity-based models and accessibility metrics which rely on these detailed data, as well as the calibration of current travel demand models. This will also greatly limit efforts related to emergency response planning for hurricanes and other large scale incidents.
- **Limit the efforts of local, regional, and statewide efforts to minimize the impacts of transit projects and transportation enhancement on environmental justice populations and to provide services for these populations**, including programs related to job access and reverse commutes.

- **Limit the ability of the transportation community to evaluate transportation choices and land use patterns; a critical need in the context of moving forward to look at alternatives to the single occupant motor vehicle.**

In sum, the proposed rules as detailed within the March 6, 2009 Federal Register will clearly and adversely affect the ability of state, metropolitan, and local planning organizations to deliver on goals and objectives mandated in Federal law as well as those supported under Executive Order by FHWA, FTA, and EPA, as critical for enhancing statewide, metropolitan, and rural economies. We urge the Department of Commerce NOT to adopt the proposed scheduled and line of data products from the 5 year ACS estimates. Further we strongly encourage the Department to collaborate with the U.S. DOT, the Transportation Research Board, and academics to develop a responsible informative solution to this difficult issue.

References: Federal Register, March 6, 2009  
AASHTO Standing Committee on Planning

Sincerely,



Ginger McGovern, P.E.  
Division Engineer  
Research and Planning Division

CC: David Streb, Director of Engineering  
Email: [Susan.Schechter.Bortner@census.gov](mailto:Susan.Schechter.Bortner@census.gov)

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<sup>i</sup> See: [http://www.census.gov/acs/www/Downloads/FedRegNotice\\_E9-4803.pdf](http://www.census.gov/acs/www/Downloads/FedRegNotice_E9-4803.pdf)

<sup>ii</sup> According to the Prepared Statement of Charles Louis Kincannon, Director, US Census Bureau, before the Subcommittee on Federal Financial Management, Government Information and International Security Committee on Homeland Security and Governmental Affairs, US Senate, 6 June 2006.  
[http://hsgac.senate.gov/public/\\_files/060606Kincannon.pdf](http://hsgac.senate.gov/public/_files/060606Kincannon.pdf).

<sup>iii</sup> The US Government Accountability Office, The American Community Survey: Accuracy and Timeliness Issues, 30 Sep 2002, <http://www.gao.gov/products/GAO-02-956R>.

<sup>iv</sup> The CTPP products have been custom tabulated to match Traffic Analysis Zones (TAZ) – the standard level of geography for the modeling process. Because TAZs are inherently small areas, new disclosure rules would suppress data at the TAZ level.





*association of central oklahoma governments*

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Oklahoma County Commissioner

Vice-Chair Kathy Walker  
Nichols Hills Mayor

Secretary/Treasurer Mark Sharpton  
Logan County Commissioner

Executive Director  
John G. Johnson

April 20, 2009

Susan Schechter, Chief  
American Community Survey Office  
Room 3K276  
MS 7500  
Washington, D.C. 20233-7500

Dear Ms. Schechter:

Thank you for the opportunity to comment on the proposed data products for the first 5-year AMERICAN Community Survey (ACS) and the "Restrictions on the Release of ACS Five year Data Products Required for Disclosure Avoidance." These restrictions and rules govern the proposed data products for the first 5-year ACS.

For transportation planning applications, it is understood that the 5-year ACS will produce data similar to that previously provided in the Census long form. A report published by the US General Accounting Office (GAO) notes that, "According to the (Census) Bureau, the 5-year averages, which would be available at the detailed long-form level of geographic detail, would be about as accurate as the long-form data."<sup>1</sup> Because the American Community Survey was to serve as the replacement of long-form data, the national transportation community responded with a new set of Census Transportation Planning Products that rely on data from the 1-year, 3-year, and 5-year American Community Survey data tabulations.

By limiting the detailed tabulations as proposed, however, the American Community Survey will not, in fact, accomplish the goal in the March 6 Federal Register, which notes, "One Goal of the (American Community Survey) is to provide small area data similar to the data published after Census 2000, based on the long-form sample." If the posted changes to the 5-year products of the American Community Survey take effect, Census data will be of limited value to the transportation community.<sup>2</sup> To this end, AASHTO Standing Committee on Planning, with the

Census Transportation Planning Products Oversight Board, has noted the following related limitations as they pertain to statewide, metropolitan, and local/ community planning, where the proposed changes to the American Community Survey would:

- **Prohibit metropolitan areas from meeting planning requirements detailed in 23 CFR 450.322**, where data at the block-group level are required. This will primarily affect analysis of journey-to-work for most tracts and block groups. Additionally, detailed analysis for transit routes, enhancements, and New Starts will be greatly hindered, since data for these analyses is already limited.
- **Hinder the calibration and development of accurate travel demand models and regional performance metrics.** Proposed legislation for surface transportation reauthorization, while still in draft form, will likely mandate additional performance monitoring and reporting across states and metropolitan regions. Limits on data availability will curtail the usefulness and development of activity-based models and accessibility metrics which rely on these detailed data, as well as the calibration of current travel demand models. This will also greatly limit efforts related to emergency response planning for hurricanes and other disasters.
- **Limit the efforts of local, regional, and statewide efforts to minimize the impacts of transportation enhancements on environmental justice populations and to provide services for these populations**, including programs related to job access and reverse commute, mobility needs of transit-dependent populations and temporary assistance for needy families, improvements for American's with disabilities, and others.
- **Limit the ability of the transportation community to evaluate transportation choices and land use patterns; a critical need in the context of national climate change strategies.** Those involved in the climate change debate have argued for more, not less, data availability to fully understand these relationships. In sum, the proposed rules as detailed within the March 6, 2009 Federal Register will clearly and adversely affect the ability of state, metropolitan, and local planning organizations to deliver on goals and objectives mandated in Federal law as well as those supported under Executive Order by FHWA, FTA, and EPA, as critical for enhancing statewide, metropolitan, and rural quality of life. The transportation community needs more information from the US Census Bureau, as well as more time, to better assess the impacts of disclosure avoidance rules and to provide suggestions for solutions to meet the needs of the planning community. Understandably, some data from the American Community Survey may not be suitable for dissemination and use by the general public; however, providing these data, including caveats regarding reliability, to state and local governments to maintain and enhance decision-making is essential for the transportation planning activities required by Federal law

Susan Schechter  
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and necessary for ensuring responsible transportation planning for all Americans in metropolitan and rural areas alike.

The Association of Central Oklahoma Governments, the Metropolitan Planning Organization for the Oklahoma City area, is very concerned about the implications that the level of data disclosure will have on the effectiveness of the 2010 Census Transportation Planning Package (CTPP). If the data disclosure is limited by the March 6, 2009 Federal Register proposals, then the investment by states and MPOs in the 2010 CTPP was a poor decision. Money spent on that program would have been more wisely spent on local surveys to use for modeling purposes. The increased necessity for all transportation mode information will be thwarted by this proposed rule.

In conclusion, MPOs are being asked to model all modes of transportation at small levels of geography in order to be more precise. In some cases, the 5-year ACS products will only be available at the place level and higher. This is a step backwards from the 2000 Census and could result in less accurate and more generalized transportation planning.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Sharp', with a long horizontal flourish extending to the right.

John Sharp, Program Coordinator  
Transportation Planning & Data Services

#### NOTES

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<sup>1</sup> The US Government Accountability Office, The American Community Survey: Accuracy and Timeliness Issues, 30 Sep 2002, <http://www.gao.gov/products/GAO-02-956R>.

<sup>2</sup> The CTPP products have been custom tabulated to match Traffic Analysis Zones (TAZ) – the standard level of geography for the modeling process. TAZs are inherently small geographic areas and the new disclosure rules would suppress valuable data required at the TAZ level.

"Ahmad Jaber" <ajaber@utah.gov>

04/18/2009 09:46 AM

To  
<Susan.Schechter.Bortner@census.gov>  
cc  
"Penelope Weinberger"  
<pweinberger@ashto.org>, "Carlos  
Braceras" <CBRACERAS@utah.gov>,  
"Charles Chappell"  
<CHARLESCHAPPELL@utah.gov>, "Chris  
Newman" <CWNEWMAN@utah.gov>,  
"Walter Steinvorth"  
<MSTEINVORTH@utah.gov>,  
<mary.tischer@virginiadot.org>  
Subject  
Re: Response to FR Notice regarding ACS  
5-year Data Products

Dear Susan,

The following is the UDOT response to the Federal Registrar notice of March 6th regarding Census Bureau's proposal for ACS 5-year data products:

The Utah Department of Transportation (UDOT) strongly opposes the action proposed by the US Census Bureau as noted in the March 6, 2009 Federal Register to revise the American Community Survey 5-year data planning products. The Department has initiated several planning initiatives that rely on these products. In addition to the reasons listed by AASHTO's letter of opposition, UDOT offers the following:

UDOT and all of the Metropolitan Planning Organizations initiated a more collaborative approach to long range transportation planning several years ago. The product of this initiative was an award winning Unified Long Range Plan. This activity was recognized and received awards from both AASHTO and AMPO in planning. Much of the analysis was dependent on data from Census Transportation Planning Products and the American Community Survey.

Utah is geographically a very large state with the majority of the population living and working in the six urbanized counties Utah, Salt

Lake, Davis, and Weber, Cache, and Washington. The remaining twenty-three counties are rural with small cities and small populations. Utah Department of Transportation has recognized the need for good planning in these counties and has initiated an Emerging Area Planning Process to help these areas develop their plans. The American Community Survey would be a critical data source for these planning activities.

UDOT is also developing a Statewide Travel Demand Model to aid in planning and project prioritization. The American Community Survey will also be critical to this effort. The only other way to obtain data and information provided through Transportation Planning Products would be through expensive statewide surveys.

The proposed changes will definitely reduce our ability to meet the goals and objectives mandated by Federal law. It will also adversely hurt the planning initiatives we have started. We have that you will reconsider the proposed action.



STATE OF MICHIGAN  
DEPARTMENT OF TRANSPORTATION  
LANSING

JENNIFER M. GRANHOLM  
GOVERNOR

KIRK T. STEUDLE  
DIRECTOR

April 17, 2009

Ms. Susan Schechter, Chief  
American Community Survey Office  
Room 3K276  
Mail Stop 7500  
Washington, D.C. 20233-7500

Dear Ms. Schechter:

The Michigan Department of Transportation (MDOT) firmly opposes the Census Bureau's proposed action regarding rules and restrictions relative to the five-year American Community Survey (ACS) data products as presented in the March 6, 2009 Federal Register Notice. The proposed revisions in ACS five-year data products would significantly reduce the quality and quantity of census data available to support transportation planning analysis in Michigan. The following discussion outlines MDOT's position.

Rule 1 of the Notice states that "ACS estimates of Unmarried Partners and characteristics of the population living in Group Quarters cannot be released at the block group level."

This means that that *no* block group data will be available for Group Quarters in five-year ACS data products. This is particularly troubling considering that Michigan has several large military areas and college towns that comprise significant shares of the population in their respective zones and have a large influence on the transportation network. Consequently, for some of Michigan's metropolitan planning organizations (MPOs) where such facilities exist, the lack of small area Group Quarters data will make federally-mandated travel demand modeling analyses more difficult. Moreover, the MPOs will have to wait until Census 2010 block-level Group Quarters data is released, likely not until 2012.

Rule 7 of the Notice states that "For the residence and workplace tables where means of transportation (mode) is crossed with one or more other variables, there must be at least three unweighted workers in sample for each transportation mode in a given place for the table to be released. Otherwise the data must be collapsed or suppressed and complementary suppression must be applied. There is no threshold on univariate tables."

The Federal Highway Administration (FHWA) has observed (and MDOT concurs) that although this may seem very straight forward, we know from the "statistical collapsing" rules that were applied to the three-year data that only one collapsing attempt is made of the data and if the table does not pass, it is discarded (suppressed). What we do not know about the current rule is what will the collapsing hierarchy be, and will the Census continue collapsing modes into each other until the threshold is met? Both the Federal Register notice and the rules are silent on this issue. In some recent work done for FHWA by the Census Bureau, it was found that, at a tract level, a great deal of data will be suppressed under Rule 7. At the block group, the suppression will likely be worse. FHWA has also

determined from this rule that all block group and most tract data for “Means of Transportation to Work” crossed with any variable, even gender, will likely *never* be available! Essentially, the overall effect of applying Rule 7 severely restricts MDOT’s ability to draw meaningful conclusions about the state’s travel behavior.

### **Implications for MDOT**

- Considering the resulting data suppression of applying these rules, the Census Bureau’s proposal would severely limit the usability of small area (tract, zone, block group) census data for multimodal planning.
- The Census Bureau’s proposed action is not aligned with established federal policy for transportation planning. The prospect of less detailed census data available at the traffic analysis zone, block group, and tract levels suggests that there was little consideration given to how this would adversely affect the ability of metropolitan areas to meet the federally-mandated planning requirements of Title 23 – Code of Federal Regulations 450.322(a).
- The Census Bureau’s proposed action is not aligned with prevailing United States Department of Transportation and the Transportation Research Board policy calling for states and MPOs to pursue more advanced transportation modeling tools such as activity-and tour-based models. These advanced modeling approaches require more detailed data available from the Census, as well as other sources. However, the proposed action would result in less detailed data being available for such modeling efforts than in 2000.
- State departments of transportation commonly use a travel demand model as a tool with which to meet federally-mandated transportation planning processes. Such models aid in projecting future traffic, identifying systems deficiencies, testing alternative transportation plans, and assessing air quality and safety issues on the transportation system. To be most effective, these models require detailed geographic data at both the residence and destination sides of travel, as well as flow information used for purposes of constructing models. Without small area data, model calibration and validation becomes a very difficult exercise.

### **Other Observations**

- Disclosure avoidance rules should be applied consistently to all variables when assessing disclosure risk and establishing restrictions on data availability. The variable, “Means of Transportation to Work,” should not be singled out and subjected to more stringent rules than other variables which have many more cross-tabulations.
- While it is understandable and commendable that the Census Bureau is adhering to Title 13 requirements, a balance needs to be achieved between protecting privacy and providing useful data to the transportation planning community. To minimize the risk of individual disclosure, the Census Bureau already applies methods such as data swapping, imputation, and top-coding. We recommend that other statistical approaches be explored that could further protect individual confidentiality while improving data accessibility.

- The addition of a county-to-county worker flow tabulation would be helpful. The Office of Management and Budget issued a Federal Register notice regarding the delineation of metropolitan areas, including the incorporation of county-to-county worker flow counts using five years of accumulated ACS records.
- The Census Bureau states that because “many of the estimates at the block group level will not be reliable,” block group data would not be released with other data products. We believe the Census Bureau should release the block group data along with the other data products, and include a statement about the reliability. The block group data should be made available in both American Fact Finder and in the ACS Data Download area, given the importance of this data for travel forecasting.
- In the March 6, 2009 Federal Register Notice (pg 9786), the Census Bureau states: “The release of the five-year estimates will achieve a goal of the ACS to provide small area data similar to the data published after Census 2000, based on the long-form sample.” The expectation of the ACS has always been that after a five-year accumulation of data, it will produce similar data products as the traditional long-form. The combination of smaller samples (given the design of the ACS) and the unweighted records threshold requirements for tabulation, results in an ACS product that can primarily be used for residence tabulations only, with limited workplace tabulations and flow data limited to total worker counts. This falls *far short* of the expectations for the ACS products. In the long run, the Census Bureau should consider alternatives to the ACS that would provide the much needed small area flow data, which is essential for meeting transportation planning requirements.

Thank you for the opportunity to review and comment on the Census Bureau’s proposed modifications to its five-year ACS data products, as listed in the March 6, 2009 Federal Register notice. Essentially, the proposed rules within the notice are unclear as to how these rules will affect various tables and program areas. The transportation planning community needs more information from the Census Bureau to analyze the effect of disclosure avoidance rules and develop strategies to handle the projected data void.

Sincerely,



Susan P. Mortel, Director  
Bureau of Transportation Planning



## NCAI Comments on Proposed Data Products for 5-year ACS Estimates



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**SOUTHWEST**  
**Derek Valdo**  
*Pueblo of Acoma*

**WESTERN**  
**Alvin Moyle**  
*Fallon Paiute Shoshone Tribe*

**EXECUTIVE DIRECTOR**  
**Jacqueline Johnson**  
*Tlingit*

**NCAI HEADQUARTERS**  
 1301 Connecticut Avenue, NW  
 Suite 200  
 Washington, DC 20036  
 202.466.7767  
 202.466.7797 fax

The following comments are submitted in response to the Census Bureau's request for comments in the March 6, 2009 Federal Register Notice concerning the data products to be issued with information from the 5-year estimates produced by the American Community Survey (ACS).

### Types of Data Products

With the exceptions discussed below, all the proposed data products for American Indian Areas/Alaska Native Areas (AIA/ANAs) contain figures on the total population of all races. This data presents a seriously misleading picture of the characteristics of the population in such areas.

Casual data users, including tribal leaders and staff, are likely to make an implicit assumption that the data for federal reservation areas represent the conditions for the Native people in such areas. However, the AI/AN Alone population constitutes less than half the total population on nearly one-third of the reservations in the country with the largest AI/AN populations.

Socio-economic conditions on reservations with substantial non-Native populations differ markedly between Native and non-Native people. The Wind River reservation illustrates the problem. According to the 3-year ACS data, the AI/AN Alone population constitutes only 25.7% of the total population on that reservation. There are marked differences between the characteristics of the AI/AN and the total population. The table below shows the extent of these differences with respect to several key social and economic indicators:

Population	Pct with less than HS/GED	Unemployment Rate	Poverty Rate
<b>AI/AN Alone</b>	19.0%	14.0%	27.7%
<b>Total Population</b>	12.7%	4.4%	13.0%

The contrast in characteristics would be even greater if the table showed the data for the AI/AN Alone and the non-AI/AN Alone populations.

The potential for confusion among casual users in interpreting the data for AIA/ANAs, particularly federal reservations, is present in the data profiles -- the most readily accessible products, available not only on the Bureau's Web site but also those of many state data centers. The same potential for confusion is present in the narrative profiles, the subject tables and the geographic comparison tables.

**To reduce the possibility for such confusion, it is strongly recommended that:**

- **The Census Bureau add a note to the bottom of each of these products for every AIA/ANA to the effect that the data displayed in this product represents data for the total population of all races, not the AI/AN population.**
- **The Bureau, in cooperation with the AI/AN Census Information Centers and other AI/AN partner organizations, conduct an intensive educational campaign for AI/AN data users to insure that users are aware of the disparities that exist among conditions for the AI/AN population and the non-AI/AN population in AIA/ANAs.**

A number of tables in the detailed table product, as well as the selected population profiles, do enable the user to obtain data for the AI/AN Alone or AN/AN Alone or in Combination populations. However, in order to choose the appropriate tables in the detailed table product, the user must have a working familiarity of the hundreds and hundreds of tables from which to make a selection.

As to the selected population profiles, the 3-year estimates product now on the Web has no profiles for the AI/AN Alone population in any reservation area and only one such profile for an Oklahoma Tribal Statistical Area and one for a State Designated Tribal Statistical Area. Whether this absence of selected population profiles for the AI/AN population in AIA/ANAs represents the effect of disclosure avoidance rules is unclear.

Readily accessible profiles with appropriate characteristics information on the AI/AN population in AIA/ANAs should be made available through the use of the ACS AI/AN Summary File, promised in the March 6th Federal Register Notice. However, as the specifications for that Summary File will be contained in a later Notice, it is impossible to comment on it at this time. In addition, the other ACS data products, such as the data profiles, are likely to be available much sooner than the AI/AN Summary File.

### **Restrictions Required for Disclosure Avoidance or Statistical Reliability**

The implications of the restrictions on the release of ACS 5-year data products on the availability of data for the AI/AN population in AIA/ANAs are unclear.

The Bureau's proposal indicates that there must be at least 50 unweighted sample cases over the 5-year period for any selected population profile to be released. This would appear to have the effect of suppressing such profiles for at least some small reservations, perhaps many Alaska Native Village Statistical Areas, and at least some tribal subdivisions.

### **The Bureau should provide an estimate of how many such areas might be affected.**

It would appear that there are no other significant restrictions. However, the small AI/AN populations in a number of AIA/ANAs would seem to make some form of disclosure avoidance necessary. What little information is available on the three small reservations included in the

Multi-Year Estimates study appears to show that there are potential disclosure and statistical reliability issues with respect to similar areas.

**What procedures does the Bureau intend to implement to protect the confidentiality of individual responses in such areas?**

### **Proposed Geographic Summary Levels for Selected 5-year Products**

The table of proposed geographic summary levels for selected ACS 5-year data products contained in the Bureau's proposal raises at least one important question for AI/AN data users. What products will be available for county portions of federal reservation areas?

The table indicates that no data products will be available for summary level 270, relating to the portion of an AIA/ANA within a given state and county. This would represent a significant problem for users wishing to distinguish the size and characteristics of the population for the areas of a county within and outside of reservation boundaries.

**The Bureau should make one or more products available with data for the AI/AN and total populations of county portions of federal reservation areas.**

"DeLania Hardy" <dhardy@ampo.org>

04/20/2009 05:12 PM

To

<Susan.Schechter.Bortner@census.gov>

cc

Subject

AMPO ACS Response letter Apr 2009.doc

April 20, 2009

Susan Schechter,  
Chief, American Community Survey Office,  
Room 3K276,  
Mail Stop 7500,  
Washington, DC 20233-7500

Dear Ms. Schechter:

On behalf of the members of the Association of Metropolitan Planning Organizations (AMPO), I am writing in response to the March 6, 2009 Federal Register notice to revise the American Community Survey 5-year data planning products.

AMPO strongly opposes the action proposed by the Census Bureau as noted in the March 6, 2009 Federal Register to revise the American Community Survey 5-year data planning products. The American Community Survey is a critical data source MPOs and their partners to conduct transportation planning that guides transportation investment decisions. The proposed changes will hinder the abilities of MPOs to meet federal planning requirements developed by USDOT and USEPA.

Implementing the changes proposed will not accomplish the goal put forth in the March 6 Federal Register, which notes, "One Goal of the (American Community Survey) is to provide small area data similar to the data published after Census 2000, based on the long-form sample." If the posted changes to the 5-year products of

the American Community Survey take effect, Census data will be of limited value to the transportation community.

AMPO as well as some of our members participate on the Census Transportation Planning Products Oversight Board (CTTP). We have also participated with AMPO in discussion of the March 6<sup>th</sup> Federal Register notice, and together we note that the proposed ACS would:

- **Prohibit metropolitan areas from meeting planning requirements detailed in 23 CFR 450.322**, where data at the block-group level are required. This will primarily affect analysis of journey-to-work for most tracts and block groups. Additionally, detailed analysis for transit routes, enhancements, and New Starts will be greatly hindered, since data for these analyses is already limited.
- **Hinder the calibration and development of accurate travel demand models and regional performance metrics**. Proposed legislation for surface transportation reauthorization, while still in draft form, will likely mandate additional performance monitoring and reporting across states and metropolitan regions. Limits on data availability will curtail the usefulness and development of activity-based models and accessibility metrics which rely on these detailed data, as well as the calibration of current travel demand models. This will also greatly limit efforts related to emergency response planning for hurricanes and other disasters.
- **Limit the efforts of local, regional, and statewide efforts to minimize the impacts of transportation enhancements on environmental justice populations and to provide services for these populations**, including programs related to job access and reverse commute, mobility needs of transit-dependent populations and temporary assistance for needy families, improvements for American's with disabilities, and others.
- **Limit the ability of the transportation community to evaluate transportation choices and land use patterns; a critical need in the context of national climate change strategies**. Those involved in the climate change debate have argued for more, not less, data availability to fully understand these relationships.

We believe the transportation community needs more information and more time from the US Census Bureau to better assess the impacts of disclosure avoidance rules and to provide suggestions for solutions to meet the needs of the planning community. We do understand that some data from the ACS may not be suitable for dissemination and use by the general public; however, providing these data, including caveats regarding reliability, to state and local governments to maintain and enhance decision-making is essential for the transportation planning activities required by Federal law and expected by the public.

Thank you for the opportunity to comment. Please contact DeLania Hardy, AMPO Executive Director, with any questions. She can be reached at (202) 296-7051.

Sincerely,  
DeLania Hardy



U.S. Department  
of Transportation  
Federal Highway  
Administration

1200 New Jersey Avenue, SE  
Washington DC 20590

Susan Schechter, Chief  
American Community Survey Office  
Room 3K276  
MS 7500  
Washington, DC 20233-7500

April 17, 2009

[Susan.schechter.bortner@census.gov](mailto:Susan.schechter.bortner@census.gov)

Subject: American Community Survey (ACS) 5-year Data Products Docket Number:  
090130099-9106-01

Dear Ms. Schechter:

Thank you for the opportunity to comment on the proposed data products for the first 5-year ACS and the "Restrictions on the Release of ACS Five Year Data Products Required for Disclosure Avoidance." These restrictions and rules govern the proposed data products for the first 5-year ACS.

The U.S. Department of Transportation, State departments of transportation and local planning agencies rely on ACS data to support decisions concerning new highway and transit construction, global climate change, emergency evacuation, long range transportation planning and congestion management. The current proposal severely limits the availability and usability of the ACS 5-year data for these purposes, affecting our ability to adequately address critical issues such as transportation mobility and climate change. In particular the "Means of Transportation to Work" variable plays a crucial role in our analyses. As currently written, the restrictions in Rule 7, which governs the level of detail in the products, would result in Tables with the "Means of Transportation to Work" variable too aggregate to be useful to transportation planners. In addition, small area data would be restricted to the point that there would be little or no utility of the ACS for small area or rural planning.

This would result in the need for much higher investments in primary data collection by the transportation data community, which would be duplicative of the ACS. In this day of limited Federal resources, we would prefer to get the best use of the ACS. While we continue to work with the American Association of State Highway and Transportation Officials on the custom tabulation, Census Transportation Planning Products, to effectively support our decision processes, we need standard ACS data products to provide journey-to-work tabulations for small geographic units, e.g. census tracts and block groups, for a broad audience addressing transportation issues.

To improve the utility of the 5-year ACS products the transportation community needs:

**Cross-tabulations using the "Means of Transportation to Work", in combination with other variables such as travel time, departure time, and worker earnings for small area**

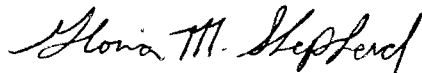
**analysis** - This will not be allowed if the proposed version of Rule 7 stands. We would like to understand why the variable “Means of Transportation to Work” has special restrictions while other variables with as many or more cross-tabulations, such as age, race, and educational attainment do not have the same restrictions. So that we may more effectively work with you, please provide an explanation of why the rules governing this variable differ from those governing other variables.

**Data from the Census Bureau for small geographic levels (tracts and block groups)** - The transportation data community is moving toward microsimulation of travel and land use activities. This requires data for small geographic levels (tracts and block groups). To protect individual confidentiality, releasing data at this level may require additional research into techniques such as synthetic data. It would be acceptable to the transportation community for the Census Bureau to attach a warning label if there is concern about the reliability of the data, so long as the block group data is released with the other ACS data products.

In addition to the above, at this time we cannot determine the full impacts of Rule 2 on data suppression. Rule 2 suppresses tables with more than 100 cells at the block group level. However, some tables which appear to have less than 100 cells are effectively cross-tabulations which result in tables with more than 100 cells. In order to understand the effect of Rule 2 on data users we need a better understanding of what data will be available under Rule 2.

Please take our comments into consideration and make revisions to the proposed set of 5-year ACS data products and the restrictions on data release. In particular we would like Rule 7 removed and the “Means of Transportation to Work” variable to have equal treatment relative to other variables used in the ACS table set.

Sincerely yours,



Gloria M. Shepherd  
Associate Administrator for  
Planning, Environment, and Realty

"Flintoft, Anna E." <Anna.Flintoft@ci.minneapolis.mn.us>

04/21/2009 02:25 PM

To

<Susan.Schechter.Bortner@census.gov>

cc

"Filipi, Mark" <Mark.Filipi@metc.state.mn.us>, "Pflaum, Donald C."

<Donald.Pflaum@ci.minneapolis.mn.us>,

"Schroeder, Greg A."

<Greg.Schroeder@ci.minneapolis.mn.us>

Subject

ACS Proposed 5 year products

Susan Schechter  
Chief, American Community Survey Office  
U.S. Census Bureau

Dear Ms. Schechter:

I realize the April 20 deadline has passed for comments on the proposed ACS 5 year products, but I just came across the information yesterday, and I hope that my comments may be considered.

I have been using the ACS products for tracking trends in transportation mode share and am looking forward to more current information on transportation mode share for our downtown central business district. Unfortunately, it appears to me from the list of proposed 5 year products that the smallest geography for means of transportation to work by workplace geography will be "place," which would not allow us to report on mode to work for downtown Minneapolis. This does not appear to be the case for means of transportation to work by place of residence, which has much smaller geographies than "place." Frankly, reporting on mode share by place of residence small geographies is significantly less useful to us than by place of work small geographies. There are more workers in downtown Minneapolis than in many "place" geographies, so I would assume that confidentiality should not be a problem.

Please consider providing workplace geographies small enough to be able to report on sub-areas of large cities, especially central business districts.

Thank you for your consideration.

Sincerely,

Anna Flintoft

\*\*\*\*\*

Anna Flintoft, PTP  
Transportation Planner  
Department of Public Works - Transportation Planning and Engineering  
City of Minneapolis  
Room 301, City of Lakes Building  
309 2nd Avenue South  
Minneapolis, MN 55401



(612) 673-3885 (office)

(612) 269-9410 (cell)

[anna.flintoft@ci.minneapolis.mn.us](mailto:anna.flintoft@ci.minneapolis.mn.us)

\*\*\*\*\*

Ken Hodges  
Nielsen Claritas  
53 Brown Road  
Ithaca, NY 14850  
March 26, 2009

Susan Schechter  
Chief, American Community Survey Office  
Room 3K276, Mail Stop 7500  
Washington, DC 20233-7500

I appreciate the opportunity to comment on the proposals for 5-year data from the American Community Survey. My comments are from the perspective of a demographer working for a private supplier of information products to a wide range of users in both the private and public sectors. They are not necessarily the views of the company.

Private sector applications tend to focus on very small areas, and ambitious levels of detail, so many business users are looking to the ACS as the new source for such data. There is great interest in the availability of ACS data for all block groups, and emphasis on the reduction in error achieved when block groups are aggregated to custom areas. Any suppression or reduction of detail is a problem for such applications.

With these basic interests in mind, the proposals in the March 6 *Federal Register* notice suggest 5-year ACS products that will be valuable to many business users. My thoughts on specific issues follow.

1. *Releasing 5-year data for block groups.*

This release of block group data is a very high priority for many business users.

2. *Not providing some products for block groups.*

For our purposes, the Detailed Tables are the key. A lack of Narrative Profiles and other re-packaging products for block groups is not a big deal.

3. *Applying reliability checks, collapsing, and suppression to 5-year ACS data.*

This would be a major problem for business users, as it would impair the ability to aggregate ACS data to custom areas. The proposal to exempt the 5-year data from collapsing and suppression will strengthen private sector support for the ACS. In fact, some have found the collapsing and suppression of 1-year and 3-year data to be a problem, and would argue for the full release of those data as well. For example, a business might want the more current 1-year estimates of income by age of householder for an aggregation of six counties. If the table is suppressed for one county (due to reliability), the business would have to use less current 3-year, or maybe even 5-year data for the area.

*4. Limitations for purposes of disclosure avoidance.*

With a few exceptions, the proposal is to provide 5-year ACS data for Detailed Tables for which 3-year data are provided – with no suppression for disclosure avoidance. This is good news for business users, and important for the objective of long form replacement.

An exception is that 5-year data would not be provided for tables with more than 100 cells. This is unfortunate, but still leaves room for considerable detail. In fact, some tables (such as income by age of householder) could show additional detail, and still be under the 100 cell limit (the reduction from 112 cells in SF3 to only 64 in ACS is severe). And I assume that the Sex by Age Detailed Tables (28 cells each, and presented separately for race categories) are treated as separate tables for this purpose, and not considered as one large Sex by Age by Race table. Such a limitation would need to be explained to users.

The other limitations relate primarily to journey to work and workplace tabulations. These limitations might present significant problems for transportation planners and others who use these tabulations. Of particular concern is the requirement for at least three unweighted workers in each transportation mode for tables where transportation is crossed with one or more other variables. Presumably, even a Detailed Table as basic as Sex of Workers by Means of Transportation to Work would be subject to this limitation. If this is the case, we would at least need journey to work tables for total workers (not crossed by other variables). All the journey to work tables I see now are crossed by at least one other variable. It would also be helpful to know why the journey to work and workplace tables are considered to need greater disclosure protection.

*5. Annual release of 5-year ACS data.*

Annual updates have been a major ACS selling point, so the proposal for annual releases of 5-year ACS data looks like exactly what users need and expect.

Thank you again for the opportunity to comment on the proposals for 5-year ACS data. We appreciate that the ACS is still a work in progress, and look forward to working with the Census Bureau to help maximize the value of the new survey to a wide range of users.

Sincerely,

Ken Hodges



# Iowa Department of Transportation

800 Lincoln Way, Ames, IA 50010

515-239-1664

Fax: 515-233-7857

March 31, 2009

Susan Schechter, Chief  
American Community Survey Office  
Room 3K276, Mail Stop 7500  
Washington, DC 20233-7500

Re: Federal Register/ Vol. 74, No. 43/ Friday, March 6, 2009/ Notices

Dear Ms. Schechter:

This letter is in reference to Federal Register Volume 74, No. 43/ Friday, March 6, 2009, Docket Number 090130099-9106-07, American Community Survey 5-Year Data Products.

The Iowa Department of Transportation has concerns regarding the geographic level and overall quality of transportation data that will be available through the American Community Survey. Since the 1970 decennial census, the Iowa transportation planning community has relied on the Census Transportation Planning Package (CTPP) and its data products, to support federally-mandated transportation planning requirements as specified in SAFETEA-LU. Examples of these requirements are travel demand modeling, long-range transportation plan development, air quality and environmental analyses, rail and bus transit studies, policy and investment scenarios.

Until the 2000 decennial Census, CTPP data products were developed from transportation related questions included on the Census "long form." A great deal of effort and cost was expended by state Departments of Transportation and Metropolitan Planning Organizations to design the CTPP products to meet their analytical needs. The CTPP data products have become one of the most utilized data sources for transportation planning in Iowa and throughout the nation.

In 2005, the US Census Bureau decided to eliminate the "long form" and replace it with the American Community Survey (ACS). The national transportation community quickly responded to the Census Bureau's decision and began to formulate a process to create a new set of CTPP data products that would be based on the ACS. In 2006, AASHTO approved a new Census Transportation Planning Products program that focused on providing the same level of data that was previously available from the Census long form. The new CTPP data products will use data from the ACS to produce one-year, three-year and five-year data tabulations to support a variety of state and local transportation planning efforts. The development of these new datasets has the potential to save a significant amount of time, effort and financial resources. Without the new ACS-based CTPP data, each state and/or MPO would otherwise be

Susan Schechter  
March 31, 2009  
Page 2

required to collect and fund travel data on their own. In many cases this would not be feasible, thus significantly reducing an agencies ability to meet their transportation planning responsibilities.

Our concern rests mainly with the level of geography the ACS data will be reported and the issue of the new disclosure rules set by the Census Bureau Disclosure Review Board. The analytical process for transportation planning has been based on a variety of geographic levels. Most notably is the travel demand modeling process which requires census data at smaller than typical levels of geography. The CTPP products have been custom tabulated to match Traffic Analysis Zones (TAZs) which is the standard level of geography for the modeling process. However, because TAZs are inherently smaller areas in size, the new disclosure rules would suppress the data at the TAZ level rendering it useless. It is understood the intent is to protect an individual's confidentiality; however, it is highly unlikely a breach would actually be realized. Having access to CTPP data at the TAZ level is critical for a number of analytical purposes.

Additionally, the new disclosure requirements specify that tables with a cross-tabulation using the variable "means of transportation to work," need to meet disclosure requirements for each category of travel mode; or else the table would be suppressed. It has become clear through testing with samples of the three-year product that applying the new disclosure requirements, specifically for the CTPP data products, there is the possibility that many tables could be suppressed, meaning the data would basically be useless for many of our transportation planning purposes.

Given the data obtained from the CTPP data products may be very limited in their overall use for transportation planning, the burden then falls to the state and the locals to obtain data that can be used to meet their federally-mandated requirements. This situation would then require additional time, effort and money to develop data sufficient to meet the analytical needs.

The CTPP data products have been a staple for transportation planning for nearly four decades and the transportation community requests the integrity of the new ACS and CTPP data be maintained.

Sincerely,



Stuart Anderson, Director  
Planning, Programming and Modal Division

SA:plr

From: jean public [jeanpublic@yahoo.com]  
Sent: 03/06/2009 05:05 AM PST  
To: Susan Schechter Bortner; americanvoices@mail.house.gov  
Cc: nytimes nytimes <jersey@nytimes.com>; info@taxpayer.net; media@cagw.org  
Subject: \*\*\*\*\*SPAM\*\*\*\*\* (9.629/4) Fw: CUT ALL OF THIS EXTRANEIOUS STUFF OUT AND  
JUST DO A TEN YEAR CENSUS

public comment on federal register

you cant even have the ten year census figured out, which is your main job.  
why are you doing endless extraneous jobs spendign tax dollars for nothing  
that truly helps america. isnt it time to focus and to cut out unnecessary  
projects like this one appears to be.  
jean public 15 elm st florham park nj07932



## Department of Transportation

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### Transportation Building

395 John Ireland Boulevard  
St. Paul, Minnesota 55155

April 20, 2009

Susan Schechter, Chief  
American Community Survey Office  
Room 3K276, Mail Stop 7500  
Washington, DC 20233-7500

Email address: [Susan.Schechter.Bortner@census.gov](mailto:Susan.Schechter.Bortner@census.gov)

Subject: Federal Register Notice on March 6, 2009  
Department of Commerce, Bureau of the Census  
Docket Number 090130099-9106-01

Dear Ms. Schechter:

The Minnesota Department of Transportation (Mn/DOT) provides the following in response to your request for comments on American Community Survey 5-Year data products.

The American Community Survey (ACS) is a critical data source for a host of state and federally mandated transportation policy, planning and analysis activities. We believe the Census Bureau's proposal for 5-year data products and the proposed restrictions for disclosure avoidance will compromise our ability to use and apply ACS small area data in many areas of the state and for many transportation applications.

Small area 5-year ACS data on residences, workplaces and modes of transportation to work are especially essential to meeting federal and state transportation planning requirements related to:

1. The analysis of population and workplace travel characteristics for transportation policy, planning and investment studies, as well as the ability to do comparative analysis with previous census data products
2. The development, validation and calibration of demand models to forecast future travel needs on urban transportation networks
3. The assessment of current and future transit, rail, bicycle and pedestrian needs and requirements
4. The development of environmental justice, air quality, and community impact studies

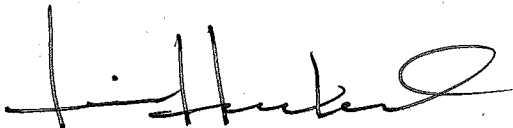
Susan Schechter  
April 20, 2009  
Page 2

The proposed disclosure avoidance restrictions come at a time when rising gas prices, economic conditions, climate change concerns and other factors are creating an unprecedented need for more detailed information on auto, transit, bicycle, pedestrian and work at home characteristics, patterns and trends for smaller and smaller geographic areas.

We understand the need to protect individual confidentiality in the release of federal census data products. However, within the community there are already concerns about the statistical reliability and robustness of ACS smaller sample sizes. The restrictions proposed in the March 6, 2009 *Federal Register* further jeopardize the utility of ACS 5-year small area data and dramatically impact many smaller metropolitan areas who rely on national data because they do not have other sources of demographic and journey to work data.

We hope that a better balance can be found that minimizes disclosure risks and provides useful data for transportation practitioners. We encourage the Census Bureau to continue to work with the transportation community on reasonable alternatives that address overall needs for these vital sources of national data.

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy Henkel". The signature is fluid and cursive, with a large loop at the end.

Timothy Henkel, Director  
Modal Planning and Program Management Division  
Minnesota Department of Transportation



April 14, 2009

Susan Schechter,  
Chief, American Community Survey Office,  
Room 3K276,  
Mail Stop 7500,  
Washington, DC 20233-7500

Dear Ms. Schechter:

The American Association of State Highway and Transportation Officials (AASHTO), with input from the Standing Committee on Planning and the Census Transportation Planning Products Oversight Board, strongly opposes the action proposed by the US Census Bureau as noted in the March 6, 2009 Federal Register to revise the American Community Survey 5-year data planning products.

The American Community Survey is a critical data source for transportation planning and related regional transportation investment. The Survey provides the backbone of detailed data necessary for transportation planning activities required under Title 23: Highways, Part 450 – Planning and Assistance Standards. In addition to severely hindering the abilities of state and metropolitan planners to meet Federal statutes and related guidance as developed and distributed by the US Federal Highway Administration (FHWA), US Federal Transit Administration, Environmental Protection Agency (EPA), and others, the proposed changes to data available under the American Community Survey (as posted in the March 6, 2009 Federal Register) will in fact hurt the very communities they are designed to protect: small rural communities, low income communities, and other environmental justice populations where English is not the primary spoken language.

The American Community Survey was fully implemented in 2005 with the support of Congress and replaces the long form of the Census. Through the American Community Survey, the US Census Bureau collects, “Detailed data for socioeconomic characteristics over the course of the decade providing yearly, up-to-date information to federal users and our nation’s communities.” The American Community Survey also provides, “Timely, accurate information for every county, city, and neighborhood—the level where the most crucial decisions affecting American communities are made.”<sup>1</sup>

For transportation planning applications, it is understood that the 5-year American Community Survey will produce data similar to that previously provided in the Census long form. A report published by the

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<sup>1</sup> According to the Prepared Statement of Charles Louis Kincannon, Director, US Census Bureau, before the Subcommittee on Federal Financial Management, Government Information and International Security Committee on Homeland Security and Governmental Affairs, US Senate, 6 June 2006.  
<http://hsgac.senate.gov/public/files/060606Kincannon.pdf>.

US General Accounting Office (GAO) notes that, “According to the (Census) Bureau, the 5-year averages, which would be available at the detailed long-form level of geographic detail, would be about as accurate as the long-form data.”<sup>2</sup> Because the American Community Survey was to serve as the replacement of long-form data, the national transportation community responded with a new set of Census Transportation Planning Products that rely on data from the 1-year, 3-year, and 5-year American Community Survey data tabulations.

By limiting the detailed tabulations as proposed, however, the American Community Survey will not, in fact, accomplish the goal in the March 6 Federal Register, which notes, “One Goal of the (American Community Survey) is to provide small area data similar to the data published after Census 2000, based on the long-form sample.” If the posted changes to the 5-year products of the American Community Survey take effect, Census data will be of limited value to the transportation community. To this end, AASHTO Standing Committee on Planning, with the Census Transportation Planning Products Oversight Board, has noted the following related limitations as they pertain to statewide, metropolitan, and local/community planning, where the proposed changes to the American Community Survey would:

- **Prohibit metropolitan areas from meeting planning requirements detailed in 23 CFR 450.322**, where data at the block-group level are required. This will primarily affect analysis of journey-to-work for most tracts and block groups. Additionally, detailed analysis for transit routes, enhancements, and New Starts will be greatly hindered, since data for these analyses is already limited.
- **Hinder the calibration and development of accurate travel demand models and regional performance metrics.** Proposed legislation for surface transportation reauthorization, while still in draft form, will likely mandate additional performance monitoring and reporting across states and metropolitan regions. Limits on data availability will curtail the usefulness and development of activity-based models and accessibility metrics which rely on these detailed data, as well as the calibration of current travel demand models. This will also greatly limit efforts related to emergency response planning for hurricanes and other disasters.
- **Limit the efforts of local, regional, and statewide efforts to minimize the impacts of transportation enhancements on environmental justice populations and to provide services for these populations**, including programs related to job access and reverse commute, mobility needs of transit-dependent populations and temporary assistance for needy families, improvements for American’s with disabilities, and others.
- **Limit the ability of the transportation community to evaluate transportation choices and land use patterns; a critical need in the context of national climate change strategies.** Those involved in the climate change debate have argued for more, not less, data availability to fully understand these relationships.

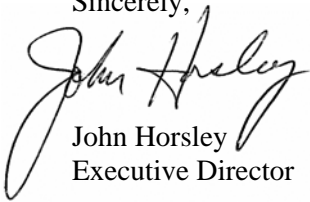
In sum, the proposed rules as detailed within the March 6, 2009 Federal Register will clearly and adversely affect the ability of state, metropolitan, and local planning organizations to deliver on goals and objectives mandated in Federal law as well as those supported under Executive Order by FHWA, FTA,

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<sup>2</sup> The US Government Accountability Office, The American Community Survey: Accuracy and Timeliness Issues, 30 Sep 2002, <http://www.gao.gov/products/GAO-02-956R>.

and EPA, as critical for enhancing statewide, metropolitan, and rural quality of life. The transportation community needs more information from the US Census Bureau, as well as more time, to better assess the impacts of disclosure avoidance rules and to provide suggestions for solutions to meet the needs of the planning community. Understandably, some data from the American Community Survey may not be suitable for dissemination and use by the general public; however, providing these data, including caveats regarding reliability, to state and local governments to maintain and enhance decision-making is essential for the transportation planning activities required by Federal law and necessary for ensuring responsible transportation planning for all Americans in metropolitan and rural areas alike.

Sincerely,



John Horsley  
Executive Director



April 17, 2009

Susan Schechter, Chief,  
American Community Survey Office  
Room 3K276, Mail stop 7500  
Washington DC 20233-7500

Dear Ms. Schechter:

The Georgia Department of Transportation (GDOT) agrees with AASHTO's responses to the actions proposed by the US Census Bureau as noted in the March 6, 2009 Federal Register to reverse the American Community Survey 5-year data planning products.

Urban transportation planning is the process that leads to decisions on transportation policies and programs. The transportation planning process relies on travel demand forecasting, which involves predicting the impacts that various policies and programs will have on travel in the urban area.

23 CFR 450.3221 requires Metropolitan Planning Organizations to project transportation demand in the metropolitan planning area over the period of the transportation plan every 4-5 years depending on attainment and GDOT is responsible to develop and maintain transportation demand forecasting models for 14 of the state's 15 MPO's. To carry out this task, GDOT relies on ACS's detailed multivariate data at the traffic analysis zone and block-group levels. Our recent inventory of overall traffic analysis zones showed that approximately 90 % of the states traffic analysis zones for which the department is responsible to develop as part of the model contain less than 1,200 in population. Therefore, we strongly voice that the proposed changes to the American community Survey would:

- **Limit the ability to accurately perform the traditional 4 step travel demand modeling:** trip generation, trip distribution, mode split, and traffic assignment. This process requires using a traffic analysis zone (TAZ) level detailed survey data to accurately estimate the number of trips that will begin and end in each individual TAZ. Census data is the building block for the model, the accuracy of which impacts project selection, allocation of federal project funds, and air quality analyses.
- **Limit the ability to properly produce emissions analysis as required by Clean Air Act of 1990** which added specificity to the relationship between air quality planning and transportation planning. The CAA and SAFETEA-LU require EPA to recommend and USDOT issue conformity determinations for transportation plans and TIPs in order to advance federally-funded projects. The CAA also requires modeling meet enhanced features in the Nation's more air quality challenged metropolitan areas. Census data is the building block for the model and meeting these requirements.

Therefore, we respectfully ask reconsideration of the action proposed by the US Census Bureau as noted in the March 6, 2009 Federal Register to revise the American Community Survey 5-year data planning products.

Sincerely,

A handwritten signature in blue ink, appearing to read "Angela T. Alexander", is written over a printed name.

Angela T. Alexander  
Division Director of Planning and Transportation Data



April 17, 2009

Susan Schechter, Chief,  
American Community Survey Office  
Room 3K276, Mail stop 7500  
Washington DC 20233-7500

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Sincerely,

A handwritten signature in blue ink that reads "Angela T. Alexander".

Angela T. Alexander  
Division Director of Planning and Transportation Data

# BROOKINGS

1775 Massachusetts Avenue, NW  
Washington, DC 20036

telephone 202.797.6139  
fax 202.797.2965  
web brookings.edu

April 20, 2009

Ms. Susan Schechter  
Chief, American Community Survey Office  
Room 3K276, Mail Stop 7500  
Washington, DC 20233-7500

**Metropolitan  
Policy  
Program**

Via email: [Susan.Schechter.Bortner@census.gov](mailto:Susan.Schechter.Bortner@census.gov)

Re: Request for Comments on the American Community Survey 5-Year Data Products

Dear Ms. Schechter,

On behalf of the Metropolitan Policy Program (Metro) of the Brookings Institution, I am pleased to respond to the notice in the March 6, 2009 *Federal Register* requesting comments regarding the Census Bureau's proposal for American Community Survey (ACS) 5-Year data products.

Metro promotes innovative solutions to help the nation's metropolitan communities grow in more inclusive, competitive, and sustainable ways. From this perspective, we are quite excited about the forthcoming availability of annually updated ACS 5-year data products for small areas, replacing once-a-decade decennial long form data products. In several ways, the 5-year data products will be an important asset for facilitating the health and well-being of metropolitan America:

- The ACS 5-year products will allow the nation's markets to work more efficiently. Businesses will use ACS 5-year data to identify markets, determine site location and product mix, and assess labor force availability.
- Local governments, metropolitan planning councils, and community-based and other local nonprofits will use ACS 5-year data to determine the need for, the design of, and the impacts of programs in realms such as transportation, health, education, workforce development, community and economic development, housing, and social services.
- Researchers will use the ACS 5-year data products to evaluate neighborhood demographic and socioeconomic trends.

We very much appreciate the hard work of the ACS Office in preparing a thoughtful, thorough 5-year data products proposal. Below, we comment on the periodicity of data release, rules for release of data, alternatives for releasing block group data, and plans for the types of products that will be released.

## Periodicity of Data Release

We enthusiastically agree with the Census Bureau's plan to release 5-year ACS estimates annually, starting in 2010. As noted, the availability of annually updated 5-year data will be a substantial boon to public and private decision-making at all levels of geography.

## Rules Related to Disclosure Avoidance and Statistical Reliability

The Census Bureau proposes that restrictions on the release of 5-year estimates be based solely on disclosure avoidance requirements, which are stricter than those used for Census 2000; it proposes to not apply statistical reliability standards to the 5-year data products.

To set the context for our response, we disagree with the Census Bureau's statement in the *Federal Register* notice that the ACS 5-year estimates will achieve the goal of providing data for small geographic areas that is similar to that of the long-form data from Census 2000. With a fixed sample size of three million households annually, the ACS 5-year sample is considerably smaller than the 1-in-6 household sample of Census 2000.

The original ACS sample design was for three percent of households each year, a level that would have produced 5-year data for small geographic areas near the reliability and disclosure avoidance levels of Census 2000. However, the Census Bureau did not receive a budget for a sample similar to that of the long form; as a result, the 5-year data products cannot be as detailed for smaller geographic areas as they were in 2000.

In light of the smaller sample size, we agree with the Census Bureau's proposed stricter disclosure avoidance requirements. At the same time, we disagree with its proposal to not apply statistical reliability standards. To avoid misuse of the data, we believe that the Census should publish data only when they can be used reliably; we think the Census Bureau should maintain its reliability standards for the release of data products given the sample size.

To aid user acceptance of this approach, we also recommend that the Census Bureau:

- openly acknowledge that, given the smaller sample size, some ACS 5-year products cannot meet some user needs for detailed census tract and block group data;
- make explicit its standards for statistical reliability and the reasons for those standards;
- unambiguously state its collapsing rules;
- work with data users, such as the transportation community, to develop summary tables that, while less detailed than in 2000, will provide general information for small geographic areas; and
- enable data users to combine custom-selected small geographies into areas large enough to produce reliable estimates—we provide proposals to this end in the next section.

As noted, an underlying issue is that the Census Bureau needs sufficient budget to collect an annual ACS sample based on the original design of three percent of households. Data users have

a responsibility to help congressional appropriators understand the consequences of inadequate funding for the ACS.

### Block Group Level Geography – Alternatives for Release of Data

Metro supports the Census Bureau's plan to suppress detailed data at the block group level and to provide only a subset of the data products.

While we have called for the Census Bureau to adhere to its reliability standards for its 5-year data products at all levels of geography, we recognize the importance of enabling data users to combine block groups to produce reliable data custom-fit to particular needs. Consequently, we strongly encourage the Census Bureau to identify one or more means by which data users can prepare such combinations that meet reliability standards. Such means might include a new Advanced Query System (AQS); Data Ferrett; and dedicated special tabulations staff at the Census Bureau.

If the Census Bureau decides to make the full set of block group estimates available, we recommend that these data not be made available through American FactFinder. Rather, we suggest that block group data be made available through Data Ferrett or ftp download and only after users review plain English statement of caution and guidance on appropriate ways to combine data to achieve a reasonable level of reliability.

Block groups are not the only geographies that will have unreliable data. Consequently, we suggest that the Census Bureau follow the above recommendations to support data user ability to safely work with unreliable estimates for census tracts and small political subdivisions.

### Types of Data Products

We support the Census Bureau's proposal to release 5-year PUMS files and 5-year ACS estimates in detailed tables in summary files, subject tables, data profiles, narrative profiles, selected population profiles, thematic maps, and geographic comparison tables. We agree that narrative profiles and selected population profiles are not needed for small geographic summary levels, such as block groups.

While we assume the comparison profiles for 5-year products will resume in 2015, we would like to see an explicit statement to that effect.

We recommend that ranking tables be a data product for the 5-year estimates at higher geographic levels (county, metropolitan, and state levels). Data users will rank areas, even if the Census Bureau does not. The advantage of the Census Bureau's providing ranking tables is that the tables show the statistical significance of the comparisons, a factor reporters and other analysts often forget.

We ask that the Census Bureau consider producing migration matrices aggregating 5-year estimates to provide state-to-state migration flows for selected demographic attributes (e.g., age, race-ethnicity, education, household type, education), and more limited matrices or



data showing inflow and outflow data for geographies of metropolitan areas, large cities and counties. The Census Bureau produced such matrices from the long form migration data after past decennial censuses.

Thank you for the opportunity to respond the proposal for 5-year data products. We appreciate your office's hard work, hope you find our comments and recommendations of value, and look forward to your response.

Sincerely,

A handwritten signature in black ink that reads "Andrew Reamer". The signature is written in a cursive, flowing style.

Andrew Reamer, Fellow  
Metropolitan Policy Program

<Elaine.Murakami@dot.gov>

04/20/2009 07:12 PM

To  
<susan.schechter.bortner@census.gov>

cc  
<melissa.c.chiu@census.gov>,  
<edc@berwyned.com>,  
<pweinberger@aaashto.org>,  
<kai.t.wu@census.gov>

Subject  
ACS 5-year Data products docket  
090130099-9106-01

ACS 5-year Data products  
Docket 090130099-9106-01

Dear Susan:

This is a small recommendation to the ACS 5-year data product list, in case Kai can't find that it already exists.

A table that breaks out Group Quarters population for Institutionalized and non-institutionalized similar to SF3 P9 or P11 would be a good addition to the ACS standard table set at the census tract level, and preferably at the block group level (omitting the proposed Rule 2).

Thanks,  
Elaine Murakami  
FHWA Office of Planning

**From:** Murakami, Elaine <FHWA>

**Sent:** Monday, April 20, 2009 4:00 PM

**To:** 'kai.t.wu@census.gov'

**Cc:** 'melissa.c.chiu@census.gov'; edc@berwyned.com; 'pweinberger@aaashto.org'

**Subject:** help with finding ACS tables with Group Quarters population (institutionalized and non-institutionalized)

Dear Kai –

I can't find any tables in ACS where institutionalized and non-institutionalized Group Quarters population are broken out. For Census 2000, this breakout was part of tables on HOUSEHOLD TYPE, e.g. P9, and P11 in SF3.

I looked in the B11xxx series on "household type" but they don't seem to be included. I can only find Group Quarters TOTAL POP (B26001).

I guess I assumed this was available in the ACS standard table set, since it was in SF3 in Census 2000, so we did not include a similar table in CTPP for the 3-year table request.

Please let me know if I have overlooked something!

Elaine

April 21, 2009

To: Susan Schechter, Chief  
American Community Survey Office  
Census Bureau

From: Patricia C. Becker, Executive Director  
Southeast Michigan Census Council

Re: Response to Federal Register Notice on Five-Year ACS Products

Let me begin by congratulating you and your staff on the comprehensive outline of 5-Year Data Products. It appears to be complete.

We have a number of concerns about the products, with a focus on the detailed tables.

1. As I have expressed on several occasions previously, *the detailed tables need a thorough review and revision*. The second item in your list of restrictions, stating that “detailed tables with more than 100 cells cannot be released at the block group level” makes this even more imperative. The problem is not with the restriction itself, but with the fact that many detailed tables far exceed 100 cells without providing any less complicated way of presenting the same data. Specific concerns include:
  - a. Tables become larger because they present estimates by sex. While these are useful in some instances, most users need a statistic such as the poverty rate or the unemployment rate *independent* of sex. As a pragmatic matter, this has meant moving the “female” cells in the table up next to the “male” cells in the spreadsheet, and then adding male and female cells together to get a total for the category of interest.
  - b. When age groups are also included in the table, the calculations become even more complicated. The classic example is B23001, in which almost tortuous manipulations of the excel rows are necessary to calculate a simple labor force participation rate or unemployment rate for a given geographic area.
  - c. The “C” tables were designed to eliminate some of the cross-tabulations in order to avoid data suppression in the one-year and three-year products. Sometimes this has meant losing the data altogether, such as in a table which

includes all possible languages, and suppression eliminates the data on Spanish which, if the other languages were not included, would not be suppressed.

More examples can be found in the paper I presented, in January, 2007, at the Applied Demography Conference. I cannot emphasize strongly enough that *if the detailed tables are not reviewed and revised, with the input of experienced users from outside the Census Bureau, these tables will continue to cause massive problems for users of ACS data.*

2. In the Notice, you request feedback on specific issues. Our response follows:
  - a. **Block Group Level Geography.** We strongly support alternative dissemination of block group data. This data set should *not* be on American FactFinder. Instead, it should be available in a download area and accompanied by written caveats that the data should be used only in aggregate format.
  - b. **Types of Data Products.** The plan is very generous in terms of the data products that will be available. We have no problem with it.
  - c. **Restrictions Required for Disclosure Avoidance or Statistical Reliability.** We have no problem with items 1, 3, 4, and 5 on this list. The concern with item 2 is discussed above – it lies not in the restriction, but in the need to redesign the detailed tables, as a product, so that the restriction will not interfere with what data users need. We will refrain from commenting on items 6 and 7, leaving that to the transportation planning community; we support their concerns.
  - d. **Periodicity of Data Release.** We certainly have no problem with the annual release of 5-year estimates; it has been the expectation from the beginning of ACS planning. We would be most interested in participating in any discussions that involved proposed changes to that plan.
3. **American FactFinder.** We know that a new version of AFF is scheduled for release in 2011, but have no details on what is planned. We are concerned that the user community has not been more involved in this process; the questionnaire that was circulated a year or two ago was insufficient. It is important for everyone to understand that, because AFF is the primary vehicle for access to ACS data, its problems are ACS' problems. Some specific concerns include:
  - a. **Aggregation capability.** Especially with the advent of tract-level data, users will increasingly want to aggregate groups of geographic areas to user-defined areas. In large cities, these are usually tracts. In strong MCD states, such as Michigan, they are also often county subdivisions. Effective use of ACS data for these user-defined areas means that users need to have margins of error recalculated, on the fly, in the AFF software, so that they may know the statistical reliability of the

data for the aggregated geography. Is this part of the AFF redesign?

- b. AFF includes a provision for saving and retrieving queries, but makes it difficult to name the query or to designate where it should be located on the user's hard drive. This should not be difficult to fix. Will it be?
- c. AFF often forces re-selection of geography when switching between various forms of data products, such as detailed tables and data profiles. This should be fixed.

I am certain that a poll of experienced AFF/ACS users would identify many other such problems. If ACS is to be successful as the major source of demographic and socio-economic information for the nation, it needs to work more interactively with users to make sure that they can get, reasonably easily, the data they need.

- 4. **Census Tract Delineation.** I am certain that the Census Bureau has given no formal thought to the question of how often census tract delineation should take place. The tradition of doing so every ten years has been part of the decennial cycle. With the advent of annual ACS data at the tract level, this issue needs to be revisited. Offhand, what may make the most sense is a 5 year revision schedule, coinciding with 5-year revision of metropolitan areas.

We remain very concerned that the 2011 ACS release is going to be on "old" – 2000 – tracts while the PL file, coming less than two months later, will include data for the new, 2010, tracts. Presumably the 2012 ACS release (for 2006-10 data collection) will also be on new tracts. This is bound to cause user confusion. We will "handle" it here in southeast Michigan, but it will be a concern nationwide.

## Target Corporation's Response to Census Bureau's ACS 5-Year Data Products Proposal

(Per Federal Register's notice requested users' specific feedback on the following four dimensions of the ACS 5-year estimates):

1. *Block Group Level Geography*. "Please comment on the option of releasing block group data but not releasing data products for this summary level with the other data products."

**RESPONSE:** For Target Corporation's business needs, we would require block group level data (Summary Level Code 150) for, at a minimum, the "Detailed Tables & ACS Summary Files" data product.

2. *Types of Data Products*. "Propose to release 5-year estimates in detailed tables, summary files, subject tables, data profiles, narrative profiles, selected population profiles, thematic maps, and geographic comparison tables. A 5-year PUMS file is also proposed. Narrative profiles and selected population profiles are not proposed for specific geographic summary levels, such as block groups."

**RESPONSE:** For Target Corporation's business needs, we would require block group level data for, at a minimum, the "Detailed Tables & ACS Summary Files" data product. However, the lack of narrative profiles and selected population profiles for specific geographic summary levels is not problematic for our needs.

3. *Restrictions Required for Disclosure Avoidance or Statistical Reliability*. "Please comment if you believe that the standards used to determine which 1- and 3-year estimates are published should also be applied to the 5-year estimates. In addition, if such limitations are implemented, tell us if you suggest that the full set of estimates be made available to users through some other means."

**RESPONSE:** Target Corporation supports the proposal that the 5-year estimates be exempt from the collapsing and suppression that will be applied to the 1-year and 3-year estimates. From our perspective, collapsing and suppression would impair users' ability to aggregate data to larger areas.

4. *Periodicity of Data Release*. "We propose that, as is the case for 1-year estimates and 3-year estimates, ACS 5-year estimates be released annually."

**RESPONSE:** Target Corporation agrees that 5-year estimates be released annually so that our analyses reflect most current read on communities as possible.



March 31, 2009

Ms. Susan Schechter  
Chief, American Community Survey Office  
Room 3K276, Mail Stop 7500  
Washington, DC 20233-7500

RE: Response to ACS 5-Year Data Products Proposal

Dear Ms. Schechter:

Enclosed is Target Corporation's response to the Census Bureau's ACS 5-Year Data Products Proposal.

Sincerely,

A handwritten signature in cursive script that reads "Ellen Mai".

Ellen Mai

cc: Joan Nayrnark

Sincerely,

Response to ACS 5-Year Data Products Proposal

Enclosed is Target Corporation's response to the Census Bureau's ACS 5-Year Data Products Proposal.

Ms. Susan Schechter

1000 Nicollet Mall, Minneapolis, MN 55403

RE: Response to ACS 5-Year Data Products Proposal





## COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION  
1401 EAST BROAD STREET  
RICHMOND, VIRGINIA 23219-2000

David S. Ekern, P.E.  
COMMISSIONER

April 20, 2009

Ms. Susan Schechter  
Chief, American Community Survey Office  
Department of Commerce, Bureau of Census  
Room 3K276  
Mail Stop 7500  
Washington, DC 20233-7500

**RE:Docket Number 090130099-9106-01**

Dear Ms. Schechter:

The Virginia Department of Transportation (VDOT) strongly opposes the action proposed by the Bureau of Census in the March 6, 2009 Federal Register notice and request for comments. We recognize that census product data is used by many government consumers and that census data needs to continue to be accessible at the same level of geographic and other detail as provided by the 2000 Census Transportation Planning Package (CTPP) developed from the 2000 Census Long Form.

The proposed revisions in American Community Survey (ACS) 5-Year data products would severely reduce the quality and quantity of census data available to support planning analyses. Three main points substantiate this response:

- The ACS proposal would severely limit the usability of census data for multimodal transportation planning. The data suppression that would result from Rule 7 would significantly increase data suppression for census tabulations where "means of transportation to work" is crossed with one or more variables. According to this rule: "there must be at least 3 unweighted workers in the sample for each transportation mode in a given place for the table to be released." As a result, "means of transportation to work" tabulations would not be available for most tracts, block groups, and Traffic Analysis Zones (TAZs).

Susan Schechter

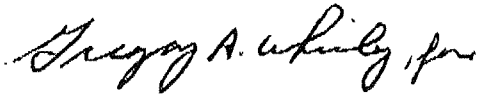
April 20, 2009

Page Two

- The ACS proposal runs counter to established federal policy for transportation planning. The proposed changes in this docket would lead to less detailed census data at the TAZ, block group, and tract level being available for states and their consumers (purportedly, in order to meet certain disclosure requirements designed to minimize risk). There does not appear to have been adequate consideration given to how this would adversely impact the ability of metropolitan areas to meet the federal planning requirements of 23 CFR 450.322.
- The ACS proposal runs counter to prevailing U.S. Department of Transportation (USDOT) and Transportation Research Board (TRB) policy calling for states and their consumers to pursue more advanced transportation modeling tools. USDOT and TRB sponsored TRB Special Report 288 encourages states and Metropolitan Planning Organizations to apply more advanced transportation modeling tools such as activity and tour based models. These more advanced tools need more detailed data available from census as well as other sources. This proposal would result in less detailed data being available for potential modeling efforts than in 2000 and prior census efforts.

Thank you for this opportunity to provide our comments on this important issue.

Sincerely,



David S. Ekern, P. E.



**Wichita-Sedgwick County Metropolitan Area Planning Department**

April 17, 2009

Susan Schechter, Chief  
American Community Survey Office  
Room 3K276, Mail Stop 7500  
Washington, DC 20233-7500

Re: The Census Bureau's Proposed Changes for American Community Survey

Dear Ms. Schechter,

The proposed changes in the Census Bureau's Proposal for American Community Survey (ACS) Five-Year Data Products could affect many elements of public planning and a myriad of other public and social service efforts. I urge you to proceed with caution in implementing these changes.

It appears to us that these changes would severely compromise meaningful assessments for neighborhood planning efforts. Census data has always been provided at geographical levels appropriate for this type of planning, which contributes significantly to neighborhood improvements in large urban areas such as Wichita. We also fear that many small communities would not be able to get meaningful data relevant to their needs.

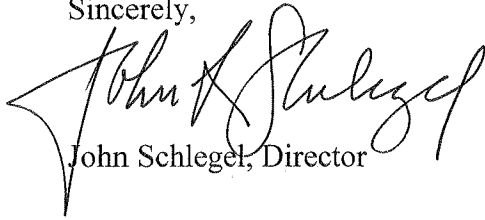
For transportation planning purposes we use economic, migration and immigration data at the Traffic Analysis Zone level. It appears that the proposed changes would make it difficult or impossible to obtain the necessary data at a meaningful geographic level. Unless federal transportation planning mandates are changed, we fear that it will not be possible to meet the many requirements that make our local jurisdictions eligible for federal transportation funds.

Environmental justice reviews for transportation and other projects also could become next to impossible to do in any meaningful way. Ethnic and socio-economic distinctions within communities are often relatively finely grained geographically.

With this proposed action the Census Bureau would effectively eliminate the usefulness of what used to be the long form and the Census Transportation Planning Package would no longer have any credibility. The proposed changes are, in my opinion, a step backwards.

Again, I urge you to proceed with caution and to expand the Census Bureau's efforts to inform the public and to extend the comment period.

Sincerely,

A handwritten signature in black ink, appearing to read "John Schlegel". The signature is written in a cursive style with a large, sweeping initial "J".

John Schlegel, Director

# WAMPO

## WICHITA AREA METROPOLITAN PLANNING ORGANIZATION

April 16, 2009

Susan Schechter, Chief  
American Community Survey Office  
Room 3K276, Mail Stop 7500  
Washington DC 20233-7500

Dear Ms. Schechter:

The Wichita Area Metropolitan Planning Organization (WAMPO) is the metropolitan planning organization (MPO) for the Wichita Kansas metropolitan area. WAMPO is comprised of 21 cities and 3 counties with over half a million population. WAMPO relies on relatively small geographic level demographic and related data from the Census Bureau in developing the many transportation programs and plans addressing growth in the region. We are very interested in the transition that the Census Bureau is making from the census long-form sample to the American Community Survey (ACS). However, we are very concerned with the level of data detail that will be available through the ACS, as described in the March 6, 2009 Federal Register.

According to prior information on the ACS that we have seen from the Census Bureau itself and from other federal agencies, we have been led to believe that the data available from the ACS would be at the "county, city, and neighborhood" level, and at the "detailed long-form level of geographic detail." Based on statements such as these, we have been anticipating ACS data tabulations that would provide as much detail as prior Census products. However, the information discussed in the March 6, 2009 Federal Register notice, and particularly the restrictions on the release of data to meet disclosure requirements, will seriously impact the amount of data actually available for smaller geographic area analysis.

The limitation in small area data will make it much more difficult to address significant issues that are important for the countries' future progress. It will also constrain decisions that must be made at a local level. It is vital that information be provided at a relatively small geographic level as the proposed changes, as we understand them, will impact:

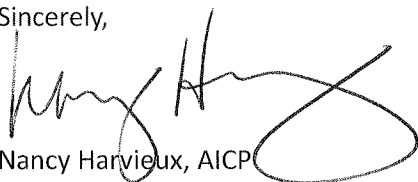
- Metropolitan Planning Organization Federal Legislation Compliance –
  - **Travel Demand Models are integral to the development of practical project programs**, the reduction in information will **dramatically limit** the usefulness of the information these models provide.
  - MPOs' ability to efficiently produce **accurate plans and programs that effectively address long-and short-range issues** require precise and complete data.

- Land Use – to effectively address land use impacts on transportation, planners must have access to relatively small geographic level data that makes it possible to **fully evaluate the relationship between land use and demographic patterns and transportation choices.**
- Social Equity – to effectively address social equity, planners must understand the composition of the population in terms of disabilities or other mobility impairments, transit-dependent populations, households receiving temporary assistance for needy families (TANF), limited English proficiency, and **environmental justice** status (low incomes and minority population concentrations) and be able to relate those individuals and households to job opportunities, job access and reverse commute needs at a small geographic scale. Reports, plans, and programs would become next to impossible to do in any meaningful way.
- Effective Transportation – in an era of decreasing transportation funding, performance-based planning takes on greater urgency. To **ensure that limited transportation resources are deployed as effectively as possible** to support the nation's economic activity, planners must have access to data that supports detailed analysis of a range of transportation options in the context of actual traveler behavior at a relatively small geographic level.

We are concerned that the proposed rules as detailed within the March 6, 2009 Federal Register will clearly and adversely affect the ability of our regional planning agency to respond to local, regional, state, and national goals and objectives. We would encourage the Census Bureau to develop and consider additional, creative solutions that would provide data at the level of detail to support responsible planning and decision-making. Understandably some data may not be suitable for the dissemination to the general public; however, with caveats on confidentiality, this information should continue to be provided to states and MPO's. Only with this information will states and MPO's be able to continue to make efficient and effective decisions.

Please consider extending the comment period and using the national agencies available such as ASSHTO and the Association of Metropolitan Planning Organizations (AMPO) to provide more insight into the ramifications of this decision.

Sincerely,



Nancy Harvieux, AICP  
Transportation Planning Manager

cc: WAMPO Transportation Policy Body

# KAMPO

Kansas Association of Metropolitan  
Planning Organizations

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April 17, 2009

Susan Schechter, Chief  
American Community Survey Office  
Room 3K276, Mail Stop 7500  
Washington DC 20233-7500

Dear Ms. Schechter:

The Kansas Association of Metropolitan Planning Organizations (KAMPO) represents 5 Metropolitan Planning Organizations (MPOs) in Kansas, coordinating with state and federal agencies (please see list at bottom of the page). KAMPO members rely on relatively small geographic level demographic and related data from the Census Bureau to develop the many transportation programs and plans addressing growth in our regions. We are very concerned about the transition that the Census Bureau is making from the census long-form sample to the American Community Survey (ACS), specifically with the level of data detail that will be available through the ACS, as described in the March 6, 2009 Federal Register.

According to prior information on the ACS that we have seen from the Census Bureau itself and from other federal agencies, we have been led to believe that the data available from the ACS would be at the "county, city, and neighborhood" level, and at the "detailed long-form level of geographic detail." Based on statements such as these, we have been anticipating ACS data tabulations that would provide as much detail as prior Census products. However, the information discussed in the March 6, 2009 Federal Register notice, and particularly the restrictions on the release of data to meet disclosure requirements, will seriously impact the amount of data actually available for smaller geographic area analysis.

The limitation in small area data will make it much more difficult to address significant issues that are important for the country's future progress. It will also constrain decisions that must be made at a local level. It is vital that information be provided at a relatively small geographic level. The proposed changes, as we understand them, will impact:

- Metropolitan Planning Organization Federal Legislation Compliance –
  - Travel Demand Models are integral to the development of practical project programs, the reduction in information will dramatically limit the usefulness of the information these models provide.
  - MPOs' ability to efficiently produce accurate plans and programs that effectively addresses long and short-range issues requiring precise and complete data.
- Land Use – to effectively address land use impacts on transportation, planners must have access to relatively small geographic level data that makes it possible to fully evaluate the relationship between land use and demographic patterns and transportation choices.

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Metropolitan Topeka Planning Organization  
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455 North Main Street  
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Kansas Association of Metropolitan  
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- Social Equity – to effectively address social equity, planners must understand the composition of the population in terms of disabilities or other mobility impairments, transit-dependent populations, households receiving temporary assistance for needy families (TANF), limited English proficiency, and environmental justice status (low incomes and minority population concentrations) and be able to relate those individuals and households to job opportunities, and job access and reverse commute needs at a small geographic scale. Reports, plans, and programs would become next to impossible to do in any meaningful way.
- Effective Transportation – in an era of decreasing transportation funding, performance-based planning takes on greater urgency. To ensure that limited transportation resources are deployed as effectively as possible to support the nation’s economic activity, planners must have access to data that supports detailed analysis of a range of transportation options in the context of actual traveler behavior at a relatively small geographic level.

KAMPO is concerned that the proposed rules as detailed within the March 6, 2009 Federal Register will clearly and adversely affect the ability of our regional planning agencies to respond to local, regional, state, and national goals and objectives. KAMPO encourages the Census Bureau to consider additional, creative solutions that would provide data at the level of detail to support responsible planning and decision-making. Understandably some data may not be suitable for the dissemination to the general public; however, with caveats on confidentiality, this information should continue to be provided to states and MPO’s. Only with this information will states and MPO’s be able to continue to make efficient and effective decisions.

Please consider extending the comment period and using the national agencies available such as National Association of Regional Councils (NARC) and the Association of Metropolitan Planning Organizations (AMPO) to provide more insight into the ramifications of this decision.

**Kansas Association of Metropolitan Planning Organizations**

- Lawrence-Douglas County Metropolitan Planning Organization
- Mid-America Regional Council
- St. Joseph Metropolitan Planning Organization
- Metropolitan Topeka Planning Organization
- Wichita Area Metropolitan Planning Organization

cc: Governor of Kansas  
KDOT Secretary  
Kansas Secretary of State  
US Senators from Kansas  
US Congressmen from Kansas  
FTA Region 7 Administrator  
FHWA Kansas Division Administrator

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## Rural Alaska Community Action Program, Inc.

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April 17, 2009

Susan Schechter  
Chief, American Community Survey Office  
U.S. Census Bureau  
4600 Silver Hill Road, Room 3K276  
Mail Stop 7500  
Washington, D.C. 20233-7500

RE: Comments on American Community Survey 5-Year Data Products/Federal Register  
Docket Number 090130099-9106-01

Dear Ms. Schechter:

I want to thank you for the attention you have given in the past year to issues pertaining to the implementation of the American Community Survey in rural Alaska. We have appreciated the Census Bureau's willingness to not only listen to our concerns, but to participate in a field visit here to see first-hand the challenges of data collection in our rural villages.

We offer the following comments regarding the American Community Survey 5-Year Data Products:

- We continue to have concerns about the small sample sizes and availability and reliability of data at the block group level for areas in rural Alaska. We encourage the Bureau to expand the sample size in sparsely-populated areas and small communities.
- There is concern that some geographic summary levels such as block groups will receive only a subset of the full set of data products.
- While we understand the logic of not preparing narrative profiles for block groups in cities and larger communities, we believe that such a product would be of great value to small communities (for whom the block group is the level of local geography) who do not have access to this kind of information from other sources. We recommend that the Bureau prepare narrative profiles for block groups in sparsely-populated areas
- Regarding the periodicity of data release, we support the U.S. Census' position that the one, three and five-year ACS estimates be released annually

While there is no question that geographic areas with populations greater than 65,000 will benefit from the release of characteristic data on an annual basis, we will need to wait until 2010 to make the same statement about Alaska's areas with limited populations.

Enclosed is a copy of RurAL CAP's 2008 Annual Report. Please note that the photo on page seven highlights the U.S. Census Bureau's 2008 visit to Atmautluak, a remote village in the Yukon-Kuskokwim Region. The photo was taken by your very own Tim Olsen, Assistant Division Chief, Field Division.

We look forward to a continued discussion about how the ACS will help provide critical information about Alaska's people.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Mitzi C. Barker', with a long horizontal line extending to the right.

Mitzi C. Barker, FAICP  
Director, Rural Housing & Planning Division



# WASATCH FRONT REGIONAL COUNCIL

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Utah Transit Authority

Robert Grow  
Envision Utah

April 20, 2009

Susan Schechter, Chief  
American Community Survey Office  
Room 3K276, Mail Stop 7500  
Washington, DC 20233-7500

Dear Ms. Schechter:

Thank you for the opportunity to comment on the proposed release of American Community Survey 5-Year Data Products. With the continued increasing emphasis on quantitative analysis for national, state, and local policy decisions, we reject the proposal that "restrictions on the release of 5-year estimates be based solely on disclosure avoidance requirements." Restriction #7 (affecting means of transportation) is particularly hard to work with for metropolitan planning organizations and other agencies responsible for transportation planning and operations. The ability to cross tabulate transportation mode with other variables at a small geographic level is essential to effective planning for transportation modes, especially to plan alternatives to the single occupant vehicle.

Restriction #7 reduces our ability to support the Administration's emphasis on improving public transportation. Here are two of several potential ideas to facilitate cross tabulation of transportation mode: 1) Focus resources, perhaps with partners, toward increasing sample size; 2) Use appropriate data synthesis techniques. We need your help in providing essential data for the federally mandated transportation planning process.

Thank you for your consideration.

Sincerely,

Charles W. Chappell, P.E.  
Executive Director.



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Susan Schechter, Chief  
American Community Survey Office  
Room 3K276, Mail Stop 7500  
Washington, DC 20233-7500

Wednesday, May 06, 2009

File: FR\_ACS\_5YR

Re: Federal Register Request for Comments: ACS 5-year Data Release

This is in response to the notice in the FR vol. 74, no. 43 of March 6, 2009. My apologies for being late on this. I was very busy on a months-long project and only heard about this from the handout at your presentation at the NCSL meeting. I understand this will, therefore, not be a part of the official record.

By way of introduction, my background includes two decades of dealing with census data releases, beginning with the summary tape files from the 1980 Census and continuing on with the annual releases of population estimates as well as other programs of the Bureau of the Census. My skills involve database programming and my mission is to process the raw census data into formats that both I can use for my own publications as well as distilling them down to useful formats for researchers.

The data for the past three decennials have used, more or less, the same general data structure and one that, in my opinion, still works in today's computing environment. Even though the hardware is greatly different than that of previous decades, much of the software is still based upon legacy concepts. Inasmuch as I am more of an analyst than a programmer, I spend my time trying to work with the data rather than developing it into the fashion of the day. As such, I find the familiar format useful and workable, and efficient from a time perspective.

However, I understand the degree to which others have adapted to newer technologies and how many users only have any actual contact with raw data via the census website at American Fact Finder. For those of us who still download the entire datasets and convert them into a format with which we are familiar, I offer the following comments.

DISTILLERS OF OFFICIAL DATA® SINCE 1974

- 1) **Distribution:** FTP is the most efficient and the bundling of many data files into as few zip files as possible works well;
- 2) **Folders:** it would be useful if the user, when they UNZIP the files, did not have multiple levels of folders on the user's computer, though this is something that can be worked around by knowledgeable users;
- 3) **Data Format:** .dbfs, though a legacy format, are useful because they can a) be opened by most software to at least view a portion of the file and b) conserve substantial disk space; they have an established data structure as to the field type and length though they have a limitation or two: namely 10 character field names and a maximum number of fields in a record (254) and a maximum of record length (but this should not be a problem given the size of the 254 fields); nevertheless, this format worked fine for previous STFs and appears to have worked fine with the 2007-3 Year release also, assuming the user keeps three separate data files for each table; whether or not the data files are released in this fashion, it would be useful to have all data shells available in .dbf format;
- 4) **LOGRECNO:** this link seems to work fine until the national compilations of datasets are brought together; for the 2000 Summary Files my recollection is that the records were merely brought together and thus the LOGRECNO was no longer unique within the file;
- 5) **SUMLEVEL:** a few basic fields were renamed for the ACS files but generally most are the same or discernible; I assume this was for convenience or standardization and that this does not indicate any actual change in the concept; nevertheless, even minor changes such as SUMLEV to SUMLEVEL will require changes in code from previous census reviews and some basic review would not need any change other than this, but this is a minor point;
- 6) **Comparability with previous census data:** I understand that the ACS data are from a different source and they are all sample data but some variables do not appear to be evident in the ACS data. E.g., URBAN vs. RURAL: which was in the census 2000 geographic files and now appears to be in the GEOCOMP records: aside from the wholesale change in METRO/MICRO schema, there are some geographic factors which accompanied the 2000 Summary Files which do not appear in the ASC, e.g., Urban/Rural and Area Size from which one can estimate population density;
- 7) **Comparability with other census data:** In a similar fashion, there are factors which are available in the PL94-171 Reapportionment files which cannot be replicated with the ACS. The PL94 files have Race and Race/Spanish Origin breaks which allow for analysis based upon a Statistically Additive/Mutually Exclusive (SAME) structure. The detailed tables in the ACS do not allow for such comparisons for all population subgroups and not for both Population and Voting Age Population.

- 8) **Citizenship:** Likewise, another factor of interest to political data users is the citizenship data as this relates directly to voter registration and turnout rates. Following 2000 there was a special tabulation which contained much of this information but again, comparability will be an issue. I wonder if there is to be a special tabulation program for the ACS whereby the data specifically useful for political researchers can be accommodated.
- 9) **Collapsed tables and Suppression:** In my recent use of the ACS files, once I became acclimated to the new data structure and was able to actually see the data, I encountered a problem with the distinction between the "B" and "C" tables (why is that there are no "A" tables?). My problem was that when I used the "B" detailed tables, I encountered suppression on the Hispanic numbers at the high geographic level of the Congressional District. This was an issue because of two misconceptions on my part: a) that there could be no suppression of any factor at such a high level of geography and b) that the Hispanic summary, unlike the Race summary, was not a specific response to the Hispanic question but was merely the combination of all the Hispanic subgroups. The problem here was that there were districts that are overwhelmingly Hispanic for which no data were available from the "B" tables, and indicated as such in the AFF tables also. Clearly others will fall into this same trap and I suggest a) on the AFF site, the creation of a link to collapsed data that might eliminate the suppression problem and b) a clear distinction of the reason for the "B" vs. "C" tables as well as c) a review of the suppression criteria for high levels of geography. This same problem showed up in a few other factors that I was using for my data review, largely due to the nature of the subgroups.
- 10) **Suppression Language:** Anent this discussion, the following line shows up if a user clicks on the Survey Methodology on the AFF site: "To maintain confidentiality, the Census Bureau applies statistical procedures that introduce some uncertainty into data for geographic areas with small population groups." If a congressional district can be such a 'geographic area' for which suppression applies for 'small population groups' this sentence should be changed as it appears that it would apply to every geographic area. Suggestion: To maintain confidentiality, the Census Bureau applies statistical procedures that introduce some uncertainty into data for <<tables that reflect data for>> small population groups, <<regardless of the level of geography>>. And then add: For many tables, there is a related, collapsed, version of the detailed table that may provide non-suppressed information by combining the responses for the small population groups.
- 11) **AFF Links:** It would be quite helpful for those of us who use the AFF site frequently to be able to replicate a search a) specifically or b) generically. I realize having a user account might be too much to request but if there was some way one could either specifically repeat a search from an earlier time or modify it so

that it was for the same table but from the 1-year versus 3-year, or for one state versus another, this would be expeditious. I use the site to review what data I would like to include as well as a check for the conversion I have made. It is also helpful for directing others to the information. It appears that the replication might be solved by the URL which appears to now be transportable or permanent. It would be even more helpful if this could be somehow be made generic so that one or two factors could be modified but for now at least one can reenter the system via the URL and that is important.

- 12) **AFF Sequence:** Another minor point but it would be quite helpful to add a row or column indication on the tables generated by the AFF site.
- 13) **Color coding:** Also, I would find it useful to add color coding somehow so that there is a clear differentiation between the 1-year, 3-year, and 5-year products, perhaps merely with a color logo that would thus also be distinguishable when reports are printed on monochrome printers.

Again, sorry for the delay, although some of these were presented by me at a recent Census Advisory Committee meeting. Likewise, sorry for the tedious aspect of some suggestions but considering that we will be dealing with this information every year now it seems appropriate to make suggestions on how to eliminate confusion.

As a final thought, I would reiterate the often heard notion that confusion will reign when the December 2010 release of the 2005-2009 5-year data 'hits the streets'.

Thank you for the opportunity to comment on the ACS data products.