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June 27, 2008

Brian Harris-Kojetin, OMB Desk Officer
Office of Information and Regulatory Affairs
Office of Management and Budget, NEOB, Room 10201
725 17th Street, NW
Washington, DC 20503

**Metropolitan
Policy
Program**

Via email: bharrisk@omb.eop.gov

Re: Request for comments regarding proposed data collection for the 2009 American Community Survey

Dear Mr. Harris-Kojetin,

On behalf of the Metropolitan Policy Program (Metro) of the Brookings Institution, I am pleased to respond to the notice in the May 28, 2008 Federal Register asking for comments regarding plans for the 2009 American Community Survey (ACS) data collection.

Metro promotes innovative solutions to help the nation's metropolitan communities grow in more inclusive, competitive, and sustainable ways. From this perspective, we believe that the ACS is critically important to the health and well-being of metropolitan America. In particular, we believe that the availability of ACS data will lead to more appropriate and effective private and public sector investments. Far more than any other dataset collected by the federal government, continued implementation of the ACS will enable private and public investors to obtain a complete, up-to-date understanding of highly detailed demographic and socioeconomic characteristics of the nation's metropolitan areas, central cities and other places, and neighborhoods. Specifically:

- The ACS allows the nation's markets to work more efficiently. With continued implementation, businesses increasingly will use ACS data to identify markets, determine site location and product mix, and assess labor force availability.
- The ACS collects information that America's communities need in order to function well. Local governments, metropolitan planning councils, and community-based and other local nonprofits will use ACS 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.

Further, we see the ACS as a critical factor in the success of the 2010 Census as it allows the census to focus solely on accurately counting the population of the United States.

Regarding the ACS questionnaire for 2009, we view the proposed changes as helpful in ensuring that the ACS is effective in obtaining complete and accurate respondent information and

adequately addresses the needs of data users, federal agencies, and Congress. We have reviewed the research results for the question on field of bachelor's degree from the 2007 ACS Content Test; we applaud both the intent of adding that question and the decision to allow for an open-ended response. We found the methodology of the data collection to be logical and appropriate. We also support the restoration of the duration of vacancy question.

In conclusion, Metro very strongly supports the continuation of the ACS and agrees with the proposed changes in the survey instrument. We hope you find our comments of value, and thank you for the opportunity to provide them.

Sincerely,

A handwritten signature in black ink, reading "Andrew Reamer". The signature is fluid and cursive, with the first name "Andrew" and last name "Reamer" clearly distinguishable.

Andrew Reamer, Fellow
Metropolitan Policy Program