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1775 Massachusetts Avenue, NW Washington, DC 20036-2103 Tel: 202-797-6000 Fax: 202-797-6004 www.brookings.edu

February 2, 2007

Diana Hynek, Departmental Paperwork Clearance Officer Department of Commerce, Room 6625 14th and Constitution Ave., NW Washington, DC 20230 via e-mail: DHynek@doc.gov

RE: Request for comments regarding the Census Bureau's proposed collection for the Boundary and Annexation Survey (BAS)

Dear Ms. Hynek,

On behalf of the Metropolitan Policy Program (MPP) of the Brookings Institution, I am pleased to respond to the notice placed by the Department of Commerce in the December 15, 2006 Federal Register asking for comments regarding the Census Bureau's proposed collection of information for the Boundary and Annexation Survey (BAS).

MPP promotes solutions to help the nation's metropolitan communities grow in more inclusive, competitive, and sustainable ways. From this perspective, we believe that accurate federal statistics are critically important to health and well-being of metropolitan America. In turn, current, accurate inventories of legal geographic boundaries are critical to ensuring the value of federal statistical programs for government and business analysis and decision-making. Examples of such statistical programs include the Census Bureau's 2010 Census, Population Estimates Program, Geographic Update Population Certification Program, Economic Census, and the American Community Survey.

Consequently, MPP vigorously supports the Census Bureau's effort to annually update the nation's inventory of governments and legal boundaries so as to account for newly incorporated places, annexations, and other changes. The BAS is an activity that no other federal agency undertakes and which provides standard collection of the information for use by governments and other organizations.

Also, we very much appreciate the Census Bureau's multi-faceted approach to collecting information, offering two means of participation (consolidation agreements, advanced response) and four means of submission (paper, digital, MAF/TIGER software, and Internet). Providing these various choices minimizes the burden on state and local governments; also, multiple means of electronic submission enables greater accuracy. We believe the Census Bureau's approach will enhance the quality, utility, and clarity of the information that it collects to update legal boundaries.

Metropolitan Policy Program We hope you find our comments of value, and thank you for the opportunity to provide them. We look forward to seeing the Census Bureau's information collection submission to OMB regarding BAS.

Sincerely,

Andrew Reamer, Fellow

Metropolitan Policy Program

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01/24/2007

As users of Census information, I would like to say that Boundary and Annexation Maps are very important. To do any kind of research into different years of Census Block Data or Census Tract Data, you need to know what boundaries are involved for your particular project. If the boundaries change from one Census to the next, you need to know where the changes were made in order to evaluate what steps you can take to insure you are comparing the right data. We have used Census information here at the Mid-Region Council of Governments since the 1960s. All of our Socioeconomic and Demographic Data use Census Maps and other information as needed, for any or all of our member government requests for help in any of their projects.

We do have GIS and as long as we continue to receive electronic maps where appropriate and paper maps where GIS is not available, we would have the tools to do our jobs correctly. Thank you for the opportunity to express our needs.

Carol L Foster Research Analyst Mid-Region Council of Governments 809 Copper Av NW Albuquerque, New Mexico 87102

Phone 505-247-1750 Email cfoster@mrcog-nm.gov Date: April 10, 2007

BAS Training Feedback

I am working with several counties in the Atlanta metropolitan area on some GIS related projects. Several folks from the counties I am working with attended a BAS Educational session conducted by the US Census. The feedback from the training was very positive and the local government folks who had previously paid little attention to the information mailings from Census now have a much better sense of how their data is used and how important their feedback is to Census. The most successful aspect from my perspective was the sense that the Census is a process and that it is an implicit partnership among all the local governments and the Census. Fosters these sorts of federal-local partnerships is a critical component to the success of all the NSDI themes and by setting this example the census is paving the way for all of the themes that follow.

I have also heard form folks in the Minneapolis area that they are all paying much closer attention to the legal descriptions of annexations and to tracking the representation of these annexations.

Municipal boundaries are so important to so many applications it is great that you guys are helping folks see the importance of this theme and the importance of getting it right the first time so that all future uses of the data are in sync.

Good job to your team Tim -

Take care Nancy

Nancy von Meyer
Fairview Industries (http://www.fairview-industries.com)
Phone 864-646-2755 Fax 864-646-2712
Mobile 864-356-6012
PO Box 100
Pendleton SC 29670