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December 15, 2009

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 e-mail: bharrisk@omb.eop.gov

RE: Request for comments regarding the Boundary and Annexation Survey and the 2010 Boundary Validation Program

Dear Mr. Harris-Kojetin,

On behalf of the Metropolitan Policy Program (Metro) of the Brookings Institution, I am pleased to respond to the notice placed by the Census Bureau in the November 19, 2009 *Federal Register* requesting comments on the Boundary and Annexation Survey (BAS) and the 2010 Boundary Validation Program (BVP).

Metro promotes innovative solutions to help the nation's metropolitan communities become more competitive, inclusive, and sustainable. From this perspective, we believe that the successful conduct of the 2010 Census is vitally important to the health and well-being of metropolitan America. We view the accurate validation of jurisdictional boundaries as an activity essential to the 2010 Census' success.

We support the Census Bureau's request for a revision to the Paperwork Reduction Act clearance for the BAS in order to conduct the BVP. We find that the Census Bureau's methodology for conducting the BVP is logical and appropriate. We appreciate the fact that the Census Bureau proposes to give local elected officials two opportunities to review the BAS maps in the MAF/TIGER Database for the 2010 Census.

We hope the Census Bureau finds our comments of value and appreciate the opportunity to provide them.

Sincerely,



Andrew Reamer, Fellow
Metropolitan Policy Program