



August 26, 2025

RE: July 27, 2025 [Federal Register Notice](#) on the Survey of Construction: Questionnaire for Building Permit Official, Docket Number USBC-2025-0010.

We appreciate the opportunity to provide comments on the Department of Commerce’s proposed extension of the *Survey of Construction: Questionnaire for Building Permit Official* (SOC). This survey plays a vital role in producing timely, reliable, and comprehensive national and regional data on new residential construction. The ability to collect accurate and consistent information from building permit officials helps ensure that housing statistics reflect actual market activity and that subsequent policy and investment decisions are grounded in robust evidence.

The SOC is a critical component of the Census Bureau’s annual population estimates for cities and towns, and these estimates are a critical resource for government agencies, businesses, and community organizations who use them for allocating federal and state funding, guiding infrastructure investments, planning public services such as schools, hospitals, and transportation, and informing emergency preparedness and disaster recovery strategies.

The population estimates use the “housing unit method” which starts with the most recent census count of housing units for each area and updates that number using building permit data, estimates of housing demolitions, and results from the SOC to reflect changes in the housing stock. The updated count of housing units is then multiplied by an estimate of the average number of people per household and adjusted for vacancy rates. By tracking changes in the number and type of housing units, along with occupancy patterns, this method provides a practical and cost-effective way to estimate population change at the city, town, and other sub-county levels in the years between full population counts.

Census Director Ron Jarmin recently published a blog in which he described work to produce estimates of Single-Family Housing Starts and Completions using satellite imagery to supplement data from the Survey of Construction.<sup>1</sup> This seems like an appropriate step in reducing the cost associated with developing such estimates. In the same blog he writes: “Given the expense of detailed imagery, a careful comparison of the cost-quality tradeoff vs. traditional personal-visit methods is required before expanding nationwide.” And yet the cost-quality tradeoff is not stated as a concern or consideration in the use of satellite imagery in the development of the Master Address File in the same blog. This leaves the reader to wonder if the Survey of Construction does not have access to the same high quality satellite imagery that is utilized in the development of the Master Address File, or if the Master Address File based on satellite imagery has not been fully scrutinized for quality.

---

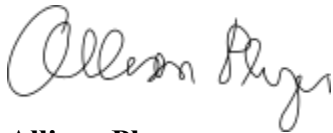
1

[https://www.census.gov/newsroom/blogs/director/2025/08/source-data-innovation.html?utm\\_campaign=20250819pio&utm\\_medium=email&utm\\_source=govdelivery](https://www.census.gov/newsroom/blogs/director/2025/08/source-data-innovation.html?utm_campaign=20250819pio&utm_medium=email&utm_source=govdelivery)

In summary, the Survey of Construction: Questionnaire for Building Permit Official provides critical data to support informed decisionmaking around housing development and markets. It also serves as a needed input to the annual population estimates for cities and towns which in turn guide innumerable public and private investment and planning decisions. The possibility of modernizing the development of estimates from the Survey of Construction by supplementing survey results with satellite imagery is an important step forward for the Census Bureau. The cost-quality tradeoff of supplementing/replacing personal-visits with satellite imagery should be carefully scrutinized for both the development of Single-Family Housing Starts and the development of the Master Address File.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script, reading "Allison Plyer".

**Allison Plyer**  
Co-Chair of the CQR Task Force  
Chief Demographer, The Data Center

A handwritten signature in cursive script, reading "Cara Brumfield".

**Cara Brumfield**  
Co-Chair of the CQR Task Force  
Senior Fellow, National Conference on  
Citizenship