



July 19, 2011

Brian Harris-Kojetin
Desk Officer
Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

**SUBJECT: RESPONSE TO COMMENT REQUEST REGARDING OMB REVIEW OF EXTENSION TO
AMERICAN COMMUNITY SURVEY OF THE U.S. CENSUS BUREAU**

Dear Mr. Harris-Kojetin:

We write in response to the comment request regarding OMB's review of the extension to the American Community Survey (ACS) of the U.S. Census Bureau (OMB Control Number 0607-0810).

The ACS provides timely data on a wide array of social, economic, housing and demographic characteristics, and is now the only source of data available for small-area levels across the United States and Puerto Rico. As such, the Puerto Rico Institute of Statistics relies heavily on this data source to meet the needs of the data user community both in Puerto Rico and in the United States, concerning data on Puerto Rico^{1,2}.

In order to ensure the ACS continues to meet these needs, it is important for the ACS sample to adequately represent households in the United States and in Puerto Rico. In its submission for OMB review, the U.S. Census Bureau states that "Starting with the June 2011 mail panel, the Census Bureau increased the annual sample size for the ACS to 3,540,000 households (or 295,000 households per month) in the 50 states and the District of Columbia."

We are surprised to find that the annual sample size for the ACS in Puerto Rico will apparently not be increased, in line with the annual sample size in the rest of the United States. We understand this may have been a simple typographical error. Nevertheless, we write to bring to your attention this omission, so that it may be corrected.

Between the 2000 and 2010 Census, the number of housing units in Puerto Rico increased 15 percent (from 1,418,476 to 1,636,946) and the number of occupied housing units increased 9 percent (from 1,261,325 to 1,376,531). Therefore, we believe an increase in the annual sample size of the ACS in Puerto Rico has merit.

¹ Because Puerto Rico is not included in other surveys conducted by the Census Bureau, users rely relatively more on ACS data for Puerto Rico. This is particularly true for users in the county (municipio) governments of Puerto Rico.

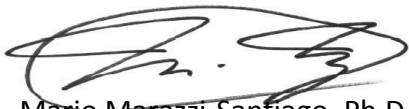
² In addition, because the ACS is used to allocate federal funds, a consistent methodology throughout the United States and Puerto Rico ensures an equitable distribution of funds.

We urge the OMB and the Census Bureau to ensure the ACS sample in Puerto Rico is increased at the earliest date possible, in line with the increase that was implemented for the rest of the U.S., so that the ACS can continue to adequately represent households in Puerto Rico, as well as it represents households in the U.S.

The Puerto Rico Institute of Statistics encourages OMB to approve the ACS extension, and we respectfully request that our concerns regarding the ACS annual sample size in Puerto Rico be taken into consideration.

For more information, please feel free to contact me at 787-993-3336 or mario.marazzi@estadisticas.gobierno.pr.

Cordially,

A handwritten signature in black ink, appearing to read 'Mario Marazzi-Santiago', enclosed within a circular scribble.

Mario Marazzi-Santiago, Ph.D.
Executive Director

c. Katherine Wallman, Chief Statistician, Office of Information Regulatory Affairs, Office of Management and Budget
William Ramos, Director, Intergovernmental Affairs, Department of Commerce
Alfredo Navarro, Assistant Division Chief, ACS Statistical Design, Census Bureau
Kenneth McIntock, Secretary of State, Puerto Rico