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BROOKINGS

April 25, 2008

Ms. Diana Hynek
Departmental Paperwork Clearance Officer
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Metropolitan Policy Program

Via email: dHynek@doc.gov

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

On behalf of the Metropolitan Policy Program (Metro) of the Brookings Institution, I am pleased to respond to the notice in the February 27, 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.

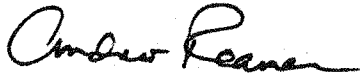
Further, we see the ACS as a critical factor in the success of the 2010 Census as it allows the census to focus solely on accurately counting the population of the United States.

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 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, appearing to read "Andrew Reamer". The signature is fluid and cursive, with the first name "Andrew" being more prominent than the last name "Reamer".

Andrew Reamer, Fellow
Metropolitan Policy Program

April 18, 2008

Ms. Diana Hynek
Departmental Paperwork Clearance Officer
Department of Commerce, Room 6625
14th and Constitution Avenue, NW
Washington, DC 20230

RE: Federal Register notice of February 27, 2007, for the American Community Survey – Form Numbers: ACS-1, ACF-1(SP), ACS-1(PR), ACS-1(PR)SP, ACS-1(GQ), ACF-1(PR)GQ, GQFQ, ACS CATI (HU), ACS CAPI (HU), ACS RI (HU), and AGQ RI (OMB Number: 0607-0810)

Dear Ms. Hynek:

The Bureau of Economic Analysis (BEA) strongly supports the continued collection of data by the U.S. Census Bureau in the American Community Survey (ACS). This important survey provides BEA with more timely annual information previously available only in the Decennial Census. The ACS has allowed Census to remove the long form from its plans for the 2010 Census. Thus, the continuation of the ACS is critical for several key components of BEA's economic statistics.

BEA uses information collected from the ACS to prepare the national income and product, input-output, and the regional economic accounts. More specifically, the ACS provides -- and with future releases of sub-state data will provide -- much needed information for BEA to prepare national, state, and county-level estimates of imputed rent; state-level estimates of the owner-occupied housing portion of gross domestic product by state for the real estate industry; county-level data for computing the residence adjustment to the labor components of personal income; and national, state, and county-level wage and employment data for employees of private households. The increased frequency of the ACS data will allow for more estimation and less interpolation or extrapolation of those components that relied on the decennial census. Data items that we use directly in our estimates are attached.

Please keep BEA informed of any modifications to these forms. We are particularly interested in any modifications proposed during the forms approval process that would substantially affect our use of these data. For additional information, please contact Ruth Bramblett, Source Data Coordinator, on 202-606-9653 or by e-mail at Ruth.Bramblett@bea.gov. If you should need assistance in justifying this form to the Office of Management and Budget, please do not hesitate to contact BEA.

Sincerely,

/s/

Dennis J. Fixler
Chief Statistician

Attachment

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Direct Use of ACS Data in Preparation of BEA's National and State Economic Accounts

Item:	Use:	NIPA Estimate:
<p>Housing Information:</p> <p>Housing units (Question 1)</p> <p>Vacancy Status (derived from a sample of vacant units researched by ACS Field Representatives)</p> <p>Tenure (Question 3)</p> <p>Ownership of Property (Question 17)</p> <p>Property Value (Question 19)</p> <p>Contract Rent (Question 18)</p> <p>Real estate taxes (Question 20)</p> <p>Condominium fees (Question 16)</p>	<p>Used to prepare estimates of imputed space rent on owner-occupied nonfarm dwellings at the U.S. level, of rent paid on tenant-occupied nonfarm dwellings at the U.S. level and rental income of persons at the U.S. level.</p>	<p>Gross Domestic Product (GDP)</p> <p>National Income</p> <p>Personal Income</p> <p>Gross Domestic Product by State</p> <p>Gross Domestic Product by Metropolitan Area</p> <p>State Personal Income</p> <p>Local area Personal Income</p> <p>Input-Output (indirectly)</p>
<p>Person Information:</p> <p>Place of residence - state, county (Question 14)</p> <p>Place of work - state, county (Question 24)</p> <p>Industry (Questions 35-40)</p> <p>Wages or salary income (Question 41a)</p> <p>Self-employment income (Question 41b)</p>	<p>Used to create gross commuting flow ratios in order to develop place-of-residence earnings estimates from place-of-work estimates by industry.</p> <p>Used to prepare county-level estimates on employment by detailed industry.</p>	<p>State Personal Income</p> <p>Local area Personal Income</p>