



August 29, 2016

Ms. Jennifer Jessup,
Departmental Paperwork Clearance Officer
Department of Commerce
Room 6616
14th and Constitution Avenue NW
Washington, DC 20230

RE: Proposed Information Collection; Comment Request; Local Update of Census Addresses Operation. Federal Register Vol. 81, No. 126/Thursday, June 30, 2016, pp. 42646-42648.

Dear Ms. Jessup,

The Steering Committee of the Federal State Cooperative for Population Estimates (FSCPE) is pleased to respond to the Federal Register notice seeking comments on Local Update of Census Addresses (LUCA) Operation for the 2020 Census.

To help put the LUCA program into perspective, state governments were allowed to be directly involved in the 2010 program which was a substantial improvement to the 2000 program. For 2010, the Census Bureau's Geography Division worked to fully engage both the State Data Center (SDC) and FSCPE programs early on so that we could better coordinate with our elected officials. In the case of my state, Nevada, I was able to promote the program to local governments and, if needed submit data for them. We hope that the Bureau will build on the successes they had with many local and state governments from the 2010 effort.

We have reviewed the comments by the City of New York regarding this Federal Register notice and are in agreement with them. They have summed up one of the major issues with LUCA, that many local governments lack the resources to conduct an effective address review. Small local governments also have concerns regarding complying with Title 13 and keeping the data compartmentalized for Decennial Census purposes only. Unfortunately, we have not seen the same level of communication by the Bureau for informing both the SDC and FSCPE about the program updates compared to 2010. This could hinder the formation of groups by state governments for helping local governments and looking at ways to pool resources.

We heartedly agree with the suggestion for funding a LUCA/MAF Coordinator either as a state or Census Bureau staff position. In Nevada's case, we will be on our third regional office for conducting the decennial census. In 1990 we were part of the Seattle Regional Office, in 2000 and 2010 we were part of the Denver Regional Office, and in 2020 we are part of the Los Angeles Regional Office. The closing of a number of regional offices and realigning which office is responsible for regional operations for each state makes the suggestion of a LUCA/MAF Coordinator more vital to the success of the 2020 Census.

The Steering Committee also strongly endorses the LUCA program. We hope the Bureau will foster an environment that permits all governments to reap the benefits of the program and fully involve its partners at the state and local levels.

Thank you for your time and consideration,

Jeff Hardcastle, Chair
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