

April 21, 2018

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

**Re: NOTICE: “Proposed Information Collection; Comment Request;
Redistricting Data Program” (USBC-2018-0003)**

Dear Ms. Jessup:

I comment on one specific issue: the inclusion of all U.S. Territories (in particular the Commonwealth of the Northern Mariana Islands) in all data collection activities. The inclusion of only two non-state areas, the Commonwealth of Puerto Rico and Washington D.C., in this program is puzzling at one end of the spectrum and disrespectful at the other end. In some limited situations, redistricting data collection may be superfluous for a U.S. Territory, for example, when the entire territory consists of one at-large election district. But the same (or at least, very similar) overriding concerns for one-person, one-vote exist for non-state jurisdictions and their subdivisions *exactly* as they do for the states.

Please take the above comment as a general response to topics (a) and (c): yes the information collected accomplishes an essential function of the agency, with “practical utility” for not just the agency, but also for the redistricting machinery of each and every jurisdiction—including non-state areas and their subdivisions. Furthermore, the “quality, utility, and clarity of the information to be collected” can only improve when the *entirety* of the United States is included in these programs.

Respectfully submitted,
Dean Palacios