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October 9, 2008

Brian Harris-Kojetin, OMB Desk Officer
Office of Information and Regulatory Affairs
Office of Management and Budget, NEOB, Room 10201
725 17th Street, NW
Washington, DC 20503

**Metropolitan
Policy
Program**

via e-mail: bharrisk@omb.eop.gov

RE: Request for comments regarding proposed Information Collection for 2010 Census, FR Doc E8-20781

Dear Mr. Harris-Kojetin,

On behalf of the Metropolitan Policy Program (Metro) of the Brookings Institution, I am pleased to respond to the notice placed by the Department of Commerce in the September 9, 2008 Federal Register asking for comments regarding data collection plans the 2010 Decennial Census.

Metro promotes innovative solutions to help the nation's metropolitan communities become more competitive, inclusive, and sustainable. From this perspective, we believe that the successful conduct of the 2010 Census is vitally important to the health and well-being of metropolitan America. For the next decade, apportionment of seats in the House of Representatives, distribution of votes in the Electoral College, legislative redistricting, the geographic flow of federal funds, public decision-making (e.g., for transportation, education, housing, healthcare) at all levels of government, and business decision-making—that is, every dimension of the American polity and economy—will rely on the results of the 2010 Census.

Thus, we are fully supportive of the Census Bureau's efforts to conduct a complete and accurate count of the nation's population and housing units. At the same time, as noted to you in prior communications, we continue to have concerns with the Census Bureau's lack of a published plan for labeling apartments in small urban multi-unit buildings without a unique address for each unit. The absence of a plan for enumerating such units can lead such units being missed; further, to the extent that they can be captured through NRFU, the time and cost of doing so may be underestimated.

We have been told that the Census Bureau would issue a data collection plan for cities with a substantial number of inadequate addresses as it has done in the Update/Enumerate (U/E) operation for Indian Reservations, colonias, and resort towns with a large number of seasonal vacancies. The supporting statements and documents, however, do not show such a plan for

cities. Therefore, we ask you to require the Census Bureau to provide such a plan as a condition of your approval of the proposed data collection.

Oddly, we note that the Census Coverage Measurement operation does include specific instructions for listing housing units without a unique label. We are pleased that the Census Bureau plans to measure this known error, but the error could be reduced with a procedure for data collection.

Metro very strongly supports the data collection activities for the 2010 Census. We ask that you consider our recommendation that the Census Bureau provide a plan for collecting data from multi-unit buildings with units that are not labeled. Without such a plan, we are concerned that the 2010 Census data collection effort, particularly for cities, will be compromised. We hope you find our comments of value and look forward to your response.

Sincerely,

A handwritten signature in dark ink, appearing to read "Andrew Reamer". The signature is fluid and cursive, with the first name "Andrew" written in a larger, more prominent script than the last name "Reamer".

Andrew Reamer, Fellow
Metropolitan Policy Program