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Federal Highway  
Administration

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Subject: American Community Survey (ACS) 5-year Data Products Docket Number:  
090130099-9106-01

Dear Ms. Schechter:

Thank you for the opportunity to comment on the proposed data products for the first 5-year ACS and the "Restrictions on the Release of ACS Five Year Data Products Required for Disclosure Avoidance." These restrictions and rules govern the proposed data products for the first 5-year ACS.

The U.S. Department of Transportation, State departments of transportation and local planning agencies rely on ACS data to support decisions concerning new highway and transit construction, global climate change, emergency evacuation, long range transportation planning and congestion management. The current proposal severely limits the availability and usability of the ACS 5-year data for these purposes, affecting our ability to adequately address critical issues such as transportation mobility and climate change. In particular the "Means of Transportation to Work" variable plays a crucial role in our analyses. As currently written, the restrictions in Rule 7, which governs the level of detail in the products, would result in Tables with the "Means of Transportation to Work" variable too aggregate to be useful to transportation planners. In addition, small area data would be restricted to the point that there would be little or no utility of the ACS for small area or rural planning.

This would result in the need for much higher investments in primary data collection by the transportation data community, which would be duplicative of the ACS. In this day of limited Federal resources, we would prefer to get the best use of the ACS. While we continue to work with the American Association of State Highway and Transportation Officials on the custom tabulation, Census Transportation Planning Products, to effectively support our decision processes, we need standard ACS data products to provide journey-to-work tabulations for small geographic units, e.g. census tracts and block groups, for a broad audience addressing transportation issues.

To improve the utility of the 5-year ACS products the transportation community needs:

**Cross-tabulations using the "Means of Transportation to Work", in combination with other variables such as travel time, departure time, and worker earnings for small area**

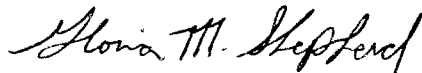
**analysis** - This will not be allowed if the proposed version of Rule 7 stands. We would like to understand why the variable “Means of Transportation to Work” has special restrictions while other variables with as many or more cross-tabulations, such as age, race, and educational attainment do not have the same restrictions. So that we may more effectively work with you, please provide an explanation of why the rules governing this variable differ from those governing other variables.

**Data from the Census Bureau for small geographic levels (tracts and block groups)** - The transportation data community is moving toward microsimulation of travel and land use activities. This requires data for small geographic levels (tracts and block groups). To protect individual confidentiality, releasing data at this level may require additional research into techniques such as synthetic data. It would be acceptable to the transportation community for the Census Bureau to attach a warning label if there is concern about the reliability of the data, so long as the block group data is released with the other ACS data products.

In addition to the above, at this time we cannot determine the full impacts of Rule 2 on data suppression. Rule 2 suppresses tables with more than 100 cells at the block group level. However, some tables which appear to have less than 100 cells are effectively cross-tabulations which result in tables with more than 100 cells. In order to understand the effect of Rule 2 on data users we need a better understanding of what data will be available under Rule 2.

Please take our comments into consideration and make revisions to the proposed set of 5-year ACS data products and the restrictions on data release. In particular we would like Rule 7 removed and the “Means of Transportation to Work” variable to have equal treatment relative to other variables used in the ACS table set.

Sincerely yours,



Gloria M. Shepherd  
Associate Administrator for  
Planning, Environment, and Realty