



STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

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April 17, 2009

Ms. Susan Schechter, Chief
American Community Survey Office
Room 3K276
Mail Stop 7500
Washington, D.C. 20233-7500

Dear Ms. Schechter:

The Michigan Department of Transportation (MDOT) firmly opposes the Census Bureau's proposed action regarding rules and restrictions relative to the five-year American Community Survey (ACS) data products as presented in the March 6, 2009 Federal Register Notice. The proposed revisions in ACS five-year data products would significantly reduce the quality and quantity of census data available to support transportation planning analysis in Michigan. The following discussion outlines MDOT's position.

Rule 1 of the Notice states that "ACS estimates of Unmarried Partners and characteristics of the population living in Group Quarters cannot be released at the block group level."

This means that that *no* block group data will be available for Group Quarters in five-year ACS data products. This is particularly troubling considering that Michigan has several large military areas and college towns that comprise significant shares of the population in their respective zones and have a large influence on the transportation network. Consequently, for some of Michigan's metropolitan planning organizations (MPOs) where such facilities exist, the lack of small area Group Quarters data will make federally-mandated travel demand modeling analyses more difficult. Moreover, the MPOs will have to wait until Census 2010 block-level Group Quarters data is released, likely not until 2012.

Rule 7 of the Notice states that "For the residence and workplace tables where means of transportation (mode) is crossed with one or more other variables, there must be at least three unweighted workers in sample for each transportation mode in a given place for the table to be released. Otherwise the data must be collapsed or suppressed and complementary suppression must be applied. There is no threshold on univariate tables."

The Federal Highway Administration (FHWA) has observed (and MDOT concurs) that although this may seem very straight forward, we know from the "statistical collapsing" rules that were applied to the three-year data that only one collapsing attempt is made of the data and if the table does not pass, it is discarded (suppressed). What we do not know about the current rule is what will the collapsing hierarchy be, and will the Census continue collapsing modes into each other until the threshold is met? Both the Federal Register notice and the rules are silent on this issue. In some recent work done for FHWA by the Census Bureau, it was found that, at a tract level, a great deal of data will be suppressed under Rule 7. At the block group, the suppression will likely be worse. FHWA has also

determined from this rule that all block group and most tract data for “Means of Transportation to Work” crossed with any variable, even gender, will likely *never* be available! Essentially, the overall effect of applying Rule 7 severely restricts MDOT’s ability to draw meaningful conclusions about the state’s travel behavior.

Implications for MDOT

- Considering the resulting data suppression of applying these rules, the Census Bureau’s proposal would severely limit the usability of small area (tract, zone, block group) census data for multimodal planning.
- The Census Bureau’s proposed action is not aligned with established federal policy for transportation planning. The prospect of less detailed census data available at the traffic analysis zone, block group, and tract levels suggests that there was little consideration given to how this would adversely affect the ability of metropolitan areas to meet the federally-mandated planning requirements of Title 23 – Code of Federal Regulations 450.322(a).
- The Census Bureau’s proposed action is not aligned with prevailing United States Department of Transportation and the Transportation Research Board policy calling for states and MPOs to pursue more advanced transportation modeling tools such as activity-and tour-based models. These advanced modeling approaches require more detailed data available from the Census, as well as other sources. However, the proposed action would result in less detailed data being available for such modeling efforts than in 2000.
- State departments of transportation commonly use a travel demand model as a tool with which to meet federally-mandated transportation planning processes. Such models aid in projecting future traffic, identifying systems deficiencies, testing alternative transportation plans, and assessing air quality and safety issues on the transportation system. To be most effective, these models require detailed geographic data at both the residence and destination sides of travel, as well as flow information used for purposes of constructing models. Without small area data, model calibration and validation becomes a very difficult exercise.

Other Observations

- Disclosure avoidance rules should be applied consistently to all variables when assessing disclosure risk and establishing restrictions on data availability. The variable, “Means of Transportation to Work,” should not be singled out and subjected to more stringent rules than other variables which have many more cross-tabulations.
- While it is understandable and commendable that the Census Bureau is adhering to Title 13 requirements, a balance needs to be achieved between protecting privacy and providing useful data to the transportation planning community. To minimize the risk of individual disclosure, the Census Bureau already applies methods such as data swapping, imputation, and top-coding. We recommend that other statistical approaches be explored that could further protect individual confidentiality while improving data accessibility.

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- The addition of a county-to-county worker flow tabulation would be helpful. The Office of Management and Budget issued a Federal Register notice regarding the delineation of metropolitan areas, including the incorporation of county-to-county worker flow counts using five years of accumulated ACS records.
- The Census Bureau states that because “many of the estimates at the block group level will not be reliable,” block group data would not be released with other data products. We believe the Census Bureau should release the block group data along with the other data products, and include a statement about the reliability. The block group data should be made available in both American Fact Finder and in the ACS Data Download area, given the importance of this data for travel forecasting.
- In the March 6, 2009 Federal Register Notice (pg 9786), the Census Bureau states: “The release of the five-year estimates will achieve a goal of the ACS to provide small area data similar to the data published after Census 2000, based on the long-form sample.” The expectation of the ACS has always been that after a five-year accumulation of data, it will produce similar data products as the traditional long-form. The combination of smaller samples (given the design of the ACS) and the unweighted records threshold requirements for tabulation, results in an ACS product that can primarily be used for residence tabulations only, with limited workplace tabulations and flow data limited to total worker counts. This falls *far short* of the expectations for the ACS products. In the long run, the Census Bureau should consider alternatives to the ACS that would provide the much needed small area flow data, which is essential for meeting transportation planning requirements.

Thank you for the opportunity to review and comment on the Census Bureau’s proposed modifications to its five-year ACS data products, as listed in the March 6, 2009 Federal Register notice. Essentially, the proposed rules within the notice are unclear as to how these rules will affect various tables and program areas. The transportation planning community needs more information from the Census Bureau to analyze the effect of disclosure avoidance rules and develop strategies to handle the projected data void.

Sincerely,



Susan P. Mortel, Director
Bureau of Transportation Planning