



U.S. Department
of Transportation
**Federal Highway
Administration**

August 5, 2008

1200 New Jersey Avenue, SE.
Washington, DC 20590

In Reply Refer To: HEPP-30

Ms. Christa D. Jones
Chief, Office of Analysis & Executive Support
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233

Re: Critical need for data from the American Community Survey (ACS)

Dear Ms. Jones:

I am writing to express the Federal Highway Administration's great concern with the Disclosure Review Board's (DRB) ruling on thresholds in the Census Transportation Planning Products (CTPP) tabulations that will suppress many of the most useful tables for transportation planning.

These CTPP tables with the variable "means of transportation to work" are widely used to support major transportation investment decisions. They are particularly critical now because financial resources are constrained, congestion has high economic costs, and transportation's contribution to global climate change is under scrutiny. The suppression of these tables will result in the inability to update models using the most current data. Replacing the journey-to-work tables from the ACS to provide an update for transportation policy analysis and travel demand models will be very expensive and time consuming.

The DRB rule suppressing many of the CTPP tables using "means of transportation to work" is significantly more restrictive than rules applied to the CTPP 2000. To date, the DRB has not provided any statistical analyses or documentation to support the most recent and more restrictive thresholds recommended for the transportation tables. This is very troublesome for our partners who want to understand "why" the data is being suppressed. We concur with the point raised in the June 2 letter from Ms. Debra L. Miller, Chair of the American Association of State Highway and Transportation Officials (AASHTO) Standing Committee on Planning, that the likelihood of identifying a specific person with 3-year ACS data is extremely low if not impossible (copy enclosed).

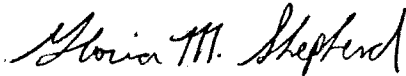
The CTPP is a product from a longstanding partnership between U.S. Department of Transportation, AASHTO and the U.S. Census Bureau, and we hope to continue this partnership. The Federal transportation planning requirements were submitted as justification for the ACS journey-to-work questions which the Census Bureau submitted to Congress this past March.

We take protecting individual confidentiality very seriously. We hope that the Data Stewardship Executive Policy Committee (DSEPC) will weigh the risks of disclosure against the utility of the

data. I look forward to the meeting with the DSEPC now scheduled for August 28, and hope we can come to a mutually agreeable solution.

Please contact Elaine Murakami (elaine.murakami@dot.gov) and Ed Christopher (ed.christopher@fhwa.dot.gov) who are working closely with the AASHTO group should you have questions.

Sincerely yours,

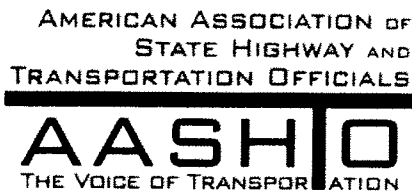
A handwritten signature in cursive script, reading "Gloria M. Shepherd".

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

Enclosure

cc:

Arnold Jackson, Associate Director for Decennial Census, Census Bureau
Robert A. Kominski, Assistant Division Chief, HHES for Social Statistics, Census Bureau
Laura V. Zayatz, Chairperson, Disclosure Review Board, Census Bureau
Debra L. Miller, Secretary, Kansas Department of Transportation, and Chair of the AASHTO
Standing Committee on Planning
John Horsley, Executive Director, AASHTO
Jonette Kreideweis, Minnesota Department of Transportation, Chair of AASHTO SCOP Census
Working Group
Jack Wells, Chief Economist, Office of the Secretary/Policy Office, U.S. DOT
James Cheatham, Director, Office of Planning, Federal Highway Administration
Elaine Murakami, Community Planner, Office of Planning, Federal Highway Administration



Pete Rahn, President
Director, Missouri Department of Transportation

John Horsley, Executive Director

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June 2, 2008

Christa D. Jones
Chief, Office of Analysis & Executive Support
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233

Dear Ms. Jones:

On behalf of the American Association of State Highway and Transportation Officials (AASHTO), we request a review and evaluation of recent decisions made by the Disclosure Review Board (DRB) regarding the 3-year American Community Survey (ACS) custom tabulations for transportation.

DRB Chair, Laura Zyatz recently shared with us a new set of disclosure requirements for transportation data tabulations. Specifically, she cited:

"For all tables where means of transportation is shown and is crossed with one or more other variables, there must be at least 3 unweighted cases for each category of means of transportation in a given geographic area for the data to be shown. Categories and/or geographic areas should be collapsed to meet this threshold." (see attached memorandum from Laura Zayatz to Celia Boertlein)

If applied, we estimate that these requirements will suppress critically needed data on means of transportation to work for over 80 percent of the places in the country. This egregious level of suppression will leave states and local governments without fundamental data to respond to Federally mandated transportation planning and policy analysis requirements. Additionally, local transportation policy decisions will be significantly impacted by lack of data on single passenger auto, transit, carpool, bike and pedestrian commuting. Restriction and suppression of these data are especially problematic in an era of unparalleled emphasis on gasoline prices, air quality, congestion management, safety, and emergency management.

We appeal to you for support and assistance in striking an appropriate balance that preserves basic utility of the data with adequate protection provisions. Over the last four decades, billions of dollars of transportation investments have been made supported by special census data tabulations for transportation. The special data tabulations on means of transportation to work are the core of our partnership with the Census Bureau. We want to stress that these are data that have been provided in the past. Furthermore, National Academy of Sciences research and the technical experts we have consulted concur that risks of disclosure are minimal for the 3-year ACS data tabulations we are requesting for large geographic places with 20,000 or more residents.

Ms. Jones
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DRB arguments for imposing the new disclosure requirements appear to be anecdotal and arbitrary. No statistical analyses or research documentation have been offered by DRB in support of the new requirements. Further, it appears that the DRB has not fully considered the design features already incorporated into the ACS to effectively minimize disclosure risks. In the ACS, data are swapped, imputed and rounded as part of the design process. In addition, the population being sampled is continually aging, changing residence, changing workplaces, and means of travel to and from work.

In an attachment to this letter we identify substantive reasons why ACS design features obviate the need for additional data suppression. We stress again that all research and statistical analysis we have seen concur that the probability of associating records with individuals in large geographic areas of over 20,000 people is insufficient to warrant the substantive data suppression that will result from the DRB decision.

I am requesting your help in working toward a solution that will allow us to continue to use and apply the ACS for transportation planning purposes. Among our members we have 50 states and 380 metropolitan planning organization partners throughout the nation who have relied on census transportation planning data for over four decades. They have committed an unprecedented \$5.9 million for a new Census Transportation Planning Products (CTPP) program of data, training, research and technical assistance. Over half of these funds have been set aside to work directly with the Census Bureau on special data tabulations. If the disclosure rules are not changed, we will not be able to use the census data for transportation planning purposes. As a result, it will be difficult to justify going forward with funding for 3-year data products and potentially all products associated with the ACS.

We are hopeful that you will take our appeal into consideration and support our efforts to negotiate a more balanced approach that can preserve our partnership. I look forward to hearing from you and working with the Census Bureau on reasonable alternatives and options. If you have specific questions, please do not hesitate to contact Mr. Ronald D. McCreedy, Program Director for Planning and Policy, AASHTO t 202/624-5807 or by email at rmccreedy@aashto.org.

Sincerely,

A handwritten signature in black ink that reads "Deb Miller". The signature is fluid and cursive, with the first name "Deb" and last name "Miller" clearly distinguishable.

Deb Miller
Secretary of Kansas DOT and
Chair, AASHTO Standing Committee on
Planning

Attachment enclosed

Copies To:

Laura V. Zayatz, Chairperson, Disclosure Review Board, Census Bureau
Robert A. Kominski, Assistant Division Chief, HHES for Social Statistics, Census Bureau
Allison K. Fields, Branch Chief, HHES for Journey to Work and Migration, Statistics Branch, Census Bureau
Melissa Chiu, Census Bureau
Kai T. Wu, Branch Chief, ACSO for Data Requirements Branch, Census Bureau

Deb Miller, Secretary Kansas Dot and Chair of the AASHTO Standing Committee on Planning
Elaine Murakami, Community Planner, Office of Planning, Federal Highway Administration
Ed Christopher, Resource Center Planning Team, Federal Highway Administration
Gloria Shepherd, Associate Administrator for Planning, Environment and Real Estate, Federal Highway Administration
James Cheatham, Director of the Office of Planning, Federal Highway Administration
Ed Weiner, Office of the Secretary/Policy Office, US DOT