



September 30, 2026

The Honorable Howard Lutnick
Secretary
U.S. Department of Commerce
1401 Constitution Avenue, NW
Washington, DC 20230

Re: Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions, Docket No. 260903-0005

Introduction

The Association of Metropolitan Planning Organizations (AMPO) appreciates the opportunity to comment on the Census Bureau's proposed residence criteria and regulations governing demographic questions for the decennial census. AMPO is a nonprofit membership organization established in 1994 to serve the needs and interests of Metropolitan Planning Organizations (MPOs) nationwide. Federal highway and transit statutes require the designation of MPOs in urbanized areas as a condition for spending federal highway or transit funds. MPOs are responsible for the planning, programming, and coordination of federal highway and transit investments under requirements and guidance from the U.S. Department of Transportation (USDOT), Federal Highway Administration (FHWA), and Federal Transit Administration (FTA).

There are 410 MPOs across the United States. MPOs bring together local elected officials, state departments of transportation (DOTs), transit agencies, local governments, and transportation partners to make regional, performance-based decisions about federal transportation investments. MPOs develop federally required Long Range Transportation Plans (LRTPs), Transportation Improvement Programs (TIPs), Public Participation Plans (PPPs), Unified Planning Work Programs (UPWPs), helping to ensure that federal investments reflect regional priorities, public input, fiscal constraint, and national goals.

Census population and demographic data are an important foundation for this work. MPOs use these data for population and socioeconomic forecasting, travel-demand modeling, long-range transportation planning, needs assessments, Title VI analysis, and small-area planning. Census population counts also inform MPO and transportation management area (TMA) designations, transportation funding distributions, program eligibility, and other population-based federal requirements.

Context and Summary of Recommendations

AMPO recognizes the Census Bureau's responsibility to establish clear and workable procedures for the decennial census. We also appreciate that Census data support a wide range of federal, state, regional, and local planning activities beyond congressional apportionment. As the Bureau considers the proposed changes, AMPO respectfully encourages several clarifications and technical considerations that would help preserve the reliability and usefulness of Census data for transportation planning.

Consideration	AMPO Recommendation
Complete resident population	Enumerate and publish a complete resident-population dataset for planning purposes if the population used for congressional apportionment differs from the full resident population.
Usual residence methodology	Further evaluate and clarify the January 3-April 1 enumeration period, the role of tax records, and how the residence standard would work in practice.
State and substate impacts	Analyze how the proposed residence criteria may affect population counts across different types of regions before implementation.
Data continuity & transportation programs	Preserve consistent population definitions and comparable data over time, and coordinate with USDOT on population-based transportation requirements.

Demographic data	Maintain reliable and continuous small-area demographic data needed for federal compliance and regional transportation planning.
National data infrastructure	Preserve nationally consistent Census products where possible to avoid shifting costly and duplicative data-development responsibilities to state and regional agencies.

1. AMPO recommends enumerating and publishing a complete resident population for planning purposes.

Proposed § 60.1 establishes the residence criteria used to determine whether and where individuals are counted for congressional apportionment. Proposed § 60.4 would count citizens of foreign countries who are also U.S. citizens or lawful permanent residents at their usual residence, while other citizens of foreign countries would not be counted for apportionment.

If the population used for congressional apportionment differs from the complete population residing in the United States, Census data products should continue to provide a clear and usable measure of the complete resident population. Transportation systems and other public infrastructure serve the people who live in a region, travel to work and school, occupy housing, and use public services regardless of how they are treated for apportionment purposes.

AMPO requests that the Bureau enumerate and publish a complete resident-population dataset at geographic levels useful for state, regional, local, corridor, and small-area planning. Census should clearly distinguish this dataset from the population used for congressional apportionment and document the methodology and appropriate uses of each measure.

AMPO also encourages Census to explain how this approach would interact with other foundational decennial Census products, particularly housing-unit and vacancy data. Housing data are widely used in transportation, land-use, and socioeconomic modeling, and the Census Bureau’s housing-unit and address framework also supports the American Community Survey (ACS). Continuity in that underlying framework is important to maintaining confidence in future ACS and Census products.

At the same time, publishing multiple population measures at very small geographic levels may raise disclosure or inference considerations if the difference between the complete resident population and the apportionment population can be derived through subtraction or combined with other publicly available data. AMPO encourages Census to explain how it would preserve useful population and housing data while addressing these disclosure considerations.

2. AMPO recommends further evaluation and clarification of the proposed usual residence methodology.

Proposed § 60.2(a) would define usual residence as the residence where an individual has lawfully spent the greatest number of days during the census enumeration period and provides that residence should be consistent with and evidenced by tax records. Section 60.2(b) would count a day when an individual spends at least one hour physically and lawfully present at a residence, and § 60.2(c) would establish January 3 through April 1 as the census enumeration period.

AMPO would welcome additional clarification on how these provisions are intended to work together in practice. For example, it would be helpful to understand how Census would approach a situation where the January-April day count points to one residence while tax records or other administrative information point to another. Further explanation of the terms “lawfully spent” and “physically and lawfully present” would also help data users understand how the standard would be applied.

The January-April period may also interact differently with regional population patterns. A person who spends most of the year in one state could accumulate more qualifying days in another during the winter months. Because § 60.2 does not require an individual to spend a majority of the enumeration period at a residence, the resulting location may not always align with where that person resides for most of the year. This issue has particular relevance for transportation planning because population forecasts and travel-demand models are



generally intended to represent year-round conditions. AMPO encourages Census to provide empirical analysis explaining why the proposed period is an appropriate measure of usual residence and how the methodology performs in areas with significant seasonal population movement.

3. AMPO recommends evaluating state and substate impacts before implementation.

The combined operation of §§ 60.2 and 60.4 may affect regions differently depending on local population characteristics. Areas with significant seasonal populations, universities and international students, agricultural workers, research and medical institutions, or other populations affected by the proposed criteria may see changes in Census counts that are not necessarily the result of underlying demographic change.

AMPO encourages Census to publish an analysis estimating the effects of the proposed changes at the state and substate levels before implementation. The effects of the § 60.2 residence methodology and § 60.4 apportionment treatment should be evaluated separately and in combination. The analysis should also address how Census will handle incomplete, conflicting, or unmatched administrative records.

Testing the proposed methodology against representative real-world scenarios would also be useful. Examples involving seasonal residents, international students, long-term foreign workers, individuals with different tax and physical-residence locations, and other common situations would help Census data users understand how the proposed criteria would operate in practice. For metropolitan planning, this distinction is important because changes caused by methodology must be distinguishable from actual demographic change when agencies develop forecasts and long-range plans.

4. AMPO recommends preserving consistent definitions and data continuity for transportation planning and population-based requirements.

Consistent population definitions and comparable Census data over time are particularly important for metropolitan transportation planning. Population and socioeconomic forecasts frequently use historic growth patterns to inform future projections. When definitions or population universes change between Census years, it can become difficult to determine whether an observed change reflects actual growth or decline or a change in methodology.

A methodological break between the 2020 and 2030 Census benchmarks could affect population estimates, socioeconomic forecasts, travel-demand model calibration and validation, and long-range transportation plan analyses. Census should provide sufficient documentation and, where practicable, comparable or bridged data products that allow users to understand and account for these differences.

Clear and consistent definitions also matter outside of technical modeling. MPOs must communicate population forecasts and planning assumptions to elected officials, local governments, transportation partners, and the public. Changes in basic population definitions can be difficult to explain and may require agencies to apply correction factors or other adjustments to otherwise familiar measures such as resident population. Consistent terminology and clear Census documentation would help maintain confidence in these data and the planning decisions that rely on them.

Travel-demand model outputs also support other federally required analyses. In nonattainment and maintenance areas, model outputs may be used as inputs to emissions analyses using MOVES or other applicable emissions models for transportation conformity determinations. Because conformity requirements are mandatory in applicable areas, continuity and reliability in the underlying population and travel-demand data have implications beyond the transportation plan itself.

Census population data are also incorporated throughout federal transportation programs and requirements. Changes in population measures could affect MPO and TMA designation thresholds, urban area population totals and designations, funding distributions and suballocations, program eligibility, and other requirements tied to population.



AMPO encourages Census to coordinate closely with USDOT and other federal agencies that rely on Census population data so states and MPOs have clear guidance regarding the appropriate population measure for federal transportation requirements.

Consistent definitions are especially important for multi-state MPOs, which rely on common population measures across state lines for regional forecasting, transportation funding, conformity analysis, and federal program administration.

5. AMPO recommends ensuring continued availability and continuity of reliable small-area demographic data.

Proposed § 70.2(a) would restrict questions about race, ethnicity, or sexual orientation from appearing on the decennial census questionnaire or another questionnaire used for population enumeration. Section 70.2(c) would also address when responses to demographic questions are required.

MPOs continue to have federal planning and civil rights responsibilities that rely on demographic information. Race and ethnicity data at small geographic levels are used in Title VI and needs analyses, neighborhood and corridor planning, transit studies, project-level analysis, socioeconomic modeling, community engagement, and certain grant applications.

AMPO appreciates that proposed § 70.4 expressly preserves the Census Bureau's ability to collect demographic information through the American Community Survey and other surveys not used for population enumeration. However, the ACS is not a complete substitute for the decennial Census. The decennial Census is designed to enumerate the full population and provides a foundational population benchmark, while the ACS is a sample survey that produces estimates from a much smaller annual sample. As a result, the two products serve different purposes and are not fully interchangeable, particularly for small-area analysis and long-term data continuity. That distinction is especially important for MPOs that rely on consistent population benchmarks and detailed demographic data for forecasting, modeling, Title VI analysis, and other transportation planning activities.

As Census develops the final rule, AMPO encourages the Bureau to explain how it will maintain the availability, continuity, geographic resolution, reliability, and comparability of these demographic data products so transportation agencies can continue to meet federal requirements and support regional and local planning.

AMPO also encourages Census to consider proposed § 70.3 alongside the Department of Commerce's Department Administrative Order 216-26, *Disclosure Avoidance for Statistical Products*. The proposed rule cites that order, which prohibits the use of noise infusion as a disclosure-avoidance technique. At the same time, proposed § 70.3(b) would limit publication of demographic data where publication would require introducing uncertainty into national or state population-count data.

AMPO recognizes the importance of both protecting respondent confidentiality and maintaining accurate population counts. Taken together, however, these policies raise practical questions about what disclosure-avoidance tools will remain available to support publication of detailed demographic data. AMPO encourages Census to explain how § 70.3 and DAO 216-26 will operate together and what that interaction will mean for the continued availability and continuity of demographic products at the tract, block group, and other small geographic levels commonly used in transportation planning.

6. AMPO recommends preserving the efficiencies and consistency of nationally coordinated Census data.

A nationally coordinated Census provides an important common statistical foundation for transportation planning and public decision-making across the country. National methodology and standards, shared implementation infrastructure, and coordinated data collection and public education create an economy of scale that would be difficult for individual states, regions, or local governments to replicate independently.

If state, local, or regional governments or public agencies must increasingly supplement Census products with local surveys, administrative records, or independently developed population and demographic estimates, differences in methodology, geographic coverage, and resolution could make comparisons across regions and



over time more difficult. Subnational efforts would also lack the same national framework and institutional infrastructure that support consistent Census data collection.

Developing independent surveys, models, or replacement datasets can require significant financial resources and staff time. For MPOs, those resources would otherwise support transportation planning, project development, and implementation of regionally significant transportation investments. Additional data collection and reconciliation can also add time to planning and project-development processes, potentially slowing the advancement of critical transportation projects.

AMPO therefore encourages Census to consider these downstream effects and, where possible, maintain nationally consistent population, housing, and demographic data products that reduce the need for individual agencies to recreate foundational datasets independently. Preserving this common national data infrastructure supports not only efficient regional planning, but meaningful comparisons among regions and timely implementation of transportation investments.

Conclusion

AMPO appreciates the Census Bureau's work to establish clear and consistent procedures for the decennial census. MPOs rely on Census data every day to understand regional growth, forecast transportation needs, administer federal programs, and plan long-term infrastructure investments.

Reliable and consistent Census data also supports the broader federal, state, regional, and local partnership responsible for moving transportation investments from planning through implementation. MPOs play an important role in identifying and advancing regionally and nationally significant projects. Reliable population, housing, and demographic data help ensure that limited planning resources can remain focused on those responsibilities.

AMPO respectfully encourages the Bureau to consider the clarifications and technical recommendations outlined above as it continues evaluating Parts 60 and 70. Enumerating and publishing a complete resident population, providing additional analysis of the proposed residence methodology, preserving consistent definitions and comparability across Census years, coordinating with federal agencies on population-based requirements, and maintaining reliable small-area demographic and housing data would help ensure that Census products continue to support effective transportation planning and project delivery.

AMPO looks forward to continued engagement with the Census Bureau, the Department of Commerce, USDOT, and other federal partners as the proposed rule is considered. Please contact Katie Economou, Legislative Director, at keconomou@ampo.org with any questions or to discuss AMPO's comments further.

Sincerely,

A handwritten signature in blue ink that reads "William Keyrouze".

Bill Keyrouze
Executive Director
Association of Metropolitan Planning Organizations