October 22, 2026

Mr. Daniel Sweeney
Deputy General Counsel for Economic, Statistical, and Regulatory Affairs
Office of the General Counsel, Department of Commerce
4600 Silver Hill Road
Designation: ADDEMO/FRN
Washington, DC 20746

RE: Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions (Docket #260903-0005; RIN 0607-AA75)
Oppose rule

Dear Mr. Sweeney:

As a frequent utilizer of Census data, the Worcester Regional Research Bureau (WRRB) greatly appreciates the hard work and commitment of the US Census Bureau in providing such important data sets such as the decennial census and the American Community Survey (ACS). From that perspective, we would respectfully share our opposition to the potential changes to the census from the proposed rule titled *Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions (Docket #260903-0005)*.

For over forty years, the Bureau has served the public interest of the Greater Worcester region, anchored by New England's second largest city, by conducting independent, objective, data-based research and analysis of public policy issues. As such, we rely on data from the US Census of all types, not only from the decennial census data collection, but also via the ACS and other data sets inter-related with the census.

Here in Worcester, these proposed changes could have a significant impact, given they would exclude residents that have been previously included in the Census, such as international students, temporary foreign workers, undocumented residents, and asylum seekers. While an exact quantitative impact of such a change is unclear, the latest ACS data shows that 25.1% of our city residents and 14.5% of our county residents are foreign born, and there are over 35,000 college students in Worcester alone. The proposed change from where respondents spend most of their time over the year to where they are from Jan. 3 to April 1, and requiring tax record linkage would also significantly alter recording of our population. As a cold climate, a substantial number of our older residents spend some time over the winter in warmer areas, and so this would artificially shift long term tracking of respondents who otherwise reside here the rest of the year. In addition, the linkage with tax records would be complicated by our disproportionate number of college students, as well as respondents who use PO Boxes, tax preparers, or are moving.

Moreover, as the Census Bureau's own Preliminary Regulatory Impact Analysis shows, the impact of the changes to the Census would negatively impact not only that data, but deteriorate associated other data, such as the American Community Survey:

> "The accuracy of ACS total-population estimates may decline because the ACS will not have an updated full count of the U.S. population. Between censuses, the Census Bureau creates intercensal population estimates and revises them when new decennial census data become available. The ACS relies on those intercensal estimates to generate its sampling weights. Without new decennial census data to recalibrate those estimates, the ACS sampling weights, and therefore its population estimates, will become less reliable….
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> The ACS, and other surveys that use intercensal estimates as population controls, would have the same limitations relative to the decennial census noted above. In addition, the quality of the estimates for the ACS and other federal surveys may deteriorate after the release of the 2030 decennial census data."

These impacts from the proposed rule are of enormous concern to the WRRB, since our research uses not only the Census data regularly, but the ACS for research across a wide range of topics such as economic development, infrastructure, and education, and our work informs local, regional, and statewide policymakers and the public. Some of the most notable examples of the use of census and ACS data in our objective research would be our compendium of data called the Worcester Almanac, a *ReInventing Worcester* report that utilized census data since 1990 to analyze changes in the city in recent decades, and our Worcester County Insights data dashboard with the Greater Worcester Community Foundation.

As a result of these concerns regarding our objective research utilizing data released by the US Census, we respectfully request that the rule and the potential changes to the census be withdrawn. We very much appreciate and value the work of the Census Bureau, and so please just let us know if there are any questions regarding this commentary.

Sincerely,

Eric Torkornoo
Chair of the Board

John Erwin
Vice Chair of the Board

Paul Matthews
Executive Director and CEO

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