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UNITED STATES OF AMERICA

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EXECUTIVE VICE PRESIDENT  
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WASHINGTON, D.C. 20062-2000  
202/463-5310

February 24, 2012

Ms. Jennifer Jessup  
Departmental Paperwork Clearance Officer  
Department of Commerce  
14th and Constitution Avenue, NW  
Room 6616  
Washington, DC 20230

Re: The American Community Survey 2013 Content Changes and Internet Response Mode

Dear Ms. Jessup,

The U.S. Chamber of Commerce, the world's largest business federation representing the interests of more than three million businesses and organizations of every size, sector and region, is pleased to submit these comments regarding the proposed American Community Survey (ACS) 2013 content changes and possible Internet response options.

As you know, a wide spectrum of economic sectors in the United States -- including many U.S. Chamber members in the retail and service industry (e.g., coffee shops; dry cleaners; banks; restaurants); broadcast, print and electronic communications; housing; transportation; housing and mortgage banking; and marketing -- use data from the decennial census and the related American Community Survey.

The ACS data points are vital for monitoring trends in the economic, social, and demographic landscape at a local level. Understanding these trends allows users of the ACS data to make informed decisions regarding strategic development opportunities that strengthen our communities, provide for the efficient and effective delivery of goods and services, create jobs, and ultimately drive economic growth.

The U.S. Chamber has reviewed the questions sponsored by the Federal Communications Commission on computer and Internet usage, and strongly supports their inclusion on the 2013 ACS questionnaires. Chamber members have witnessed the growth in Internet shopping in the retail sector among individuals and businesses, and feel that analyzing these trends down to the local level can help small businesses tailor their marketing to a focused group of consumers.

Additionally, we believe that small and medium-sized business will welcome the possibility to respond to the survey online, as many have suggested that this could streamline the process of responding -- and may also increase the response rate for the sample size thus eliminating costly follow-up.

The Chamber appreciates the opportunity to comment on the proposed American Community Survey 2013 content changes and possible Internet response options, and looks forward to implementing these improvements to ensure that the American Community Survey continues to bring us the type of demographic data that businesses of all sizes have come to rely on for planning and expanding.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Bruce Josten". The signature is fluid and cursive, with the first name "R." and last name "Josten" being the most prominent parts.

R. Bruce Josten

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May 4, 2011

Ms. Diana Hynek  
Departmental Paperwork Clearance Officer  
U.S. Department of Commerce  
1401 Constitution Ave., NW  
Washington, DC 20230

Submitted via electronic mail to [dhynek@doc.gov](mailto:dhynek@doc.gov)

Re: File Reference Doc. 2011-5269  
Comment Request: The American Community Survey

Dear Ms. Hynek,

The International Council of Shopping Centers (ICSC) welcomes the opportunity to respond to the request for comments from the U.S. Census Bureau regarding the continuation and possible enhancement of the American Community Survey (ACS).

Founded in 1957, ICSC is the global trade association of the shopping center industry. Its 55,000 members in the U.S., Canada and more than 90 other countries include shopping center owners, developers, managers, marketing specialists, investors, lenders, retailers and other professionals as well as academics and public officials. In the United States there are more than 106,000 shopping centers which employ slightly more than nine percent of the total U.S. workforce.

In the context of the ACS, ICSC represents thousands of individuals, corporations and organizations that make use of these data on a regular basis. As a representative of the industry, ICSC recognizes the importance of these data for a range of business decisions. The ACS data are absolutely vital for monitoring trends in the economic, social and demographic landscape at a local level. Understanding these trends allows users of the data to make informed decisions regarding strategic development opportunities that strengthen our communities, provide for the efficient and effective delivery of goods and services, create jobs and ultimately drive economic growth.

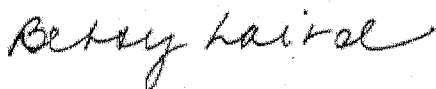
In the retail and commercial real estate industries, ACS data guide decisions on where to build commercial facilities and open new stores, and subsequently evaluate their performance. These are high stakes decisions with lasting consequences for the companies making them, and for the communities involved. ACS data drive the allocation of private-sector investments that determine which communities are in need of infrastructure development and how the resulting jobs will be distributed. With so much on the line, the data need to be of a quality that only full funding can sustain.

ICSC understands that the ACS is a federal survey that collects information required for federal programs. Although these data are not collected for the private sector, businesses in nearly all industries put this inimitable information to productive use and local economic development organizations use these same data in understanding its community's needs and potential. Therefore, in assessing the value of a program such as the ACS, one needs to consider the immeasurable contributions this data collection program makes to the efficient operation of both large and small companies as well as local economic development initiatives.

While, the business sector has some impressive information resources of its own, we cannot come close to replacing the quality of the short form census counts or the rich neighborhood-level detail that the ACS is now providing. Further, the private sector's internal information resources tend to be proprietary, limiting their use to those who own, or can purchase access to them. In contrast, Census data are available to all, and thus play a key role in the establishment and growth of small business.

In summary, the ACS is especially valued by businesses for their ability to provide accurate information at the neighborhood level. And it is this ability that depends on funding levels proposed by the Census Bureau. To continue the widespread benefits achieved by the businesses use of ACS data, ICSC strongly supports their continued funding.

Sincerely,



Betsy R. Laird  
Senior Staff Vice President  
Office of Global Public Policy  
International Council of Shopping Centers