FORDHAM
UNIVERSITY

August 4, 2000

Dear Mr. Thompson

I am writing in support of the proposed rule on "reporting of population to states and localities pursuant to 13 U.S.C. 141(c) and availability of other population information" that appeared in the *Federal Register*, Vol. 65, No. 119 (June 20, 2000), pp. 38370-38371.

The proposed rule reflects sound science and embodies responsible public and statistical policy. While there are many reasons why this is so, I would emphasize three: first, statistical sampling is good science; second, delegating decision-making authority to the Director of the Census Bureau in consultation with the Bureau's senior professional staff (i.e., the Executive Steering Committee for A.C.E. Policy) is a sound means for removing this aspect of the decennial census from short-term political considerations; and third, sampling also has the additional benefit of lowering the possibility that future U.S. population censuses will ever be misused by the government or other users to target and harm individuals who are members of minorities or other special population groups

In the discussions related to the proposed rule, some have questioned the scientific validity of sampling. To me, this seems an unwarranted concern, given that we properly rely on sampling in our daily lives (for example, to test whether boiling potatoes are cooked), in medicine (for example, to examine our blood so that lab tests can carried out), in manufacturing and in the military (for example, to evaluate processes and activities through quality control studies) and in public policy (for example, the use of sample surveys to collect much of the economic data used in public and private decision-making). Of course, the list at this point in history is almost endless. In short, statistical sampling is good science, and its efficacy has been both established by theory and justified by applications all across public and private life.

Free societies with popularly-elected governments always face a challenge in how to insulate technical decisions on statistical issues from short-term partisan political influence. (Of course, dictatorial governments or one-party countries are never troubled by such issues.) Based on my study of the various procedures and arrangements used in the United States and in countries around the world to promote the integrity of governmental statistical work, the

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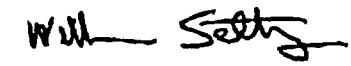
proposed rule resolves the issue in a sound manner. I reach this conclusion based on my extensive experience in the United Nations Statistical Division, both as chief of demographic and social statistics (12 years) and as director of the entire division (8 years) and related research that I and others have carried out.

Finally, an additional benefit associated with the use of sampling in the decennial census permitted under the proposed rule, is that it reduces the likelihood that future U.S. population censuses will ever be misused to target individuals who are members of minorities or other special population groups. While the fact of such a future misuse is highly unlikely, it can not be dismissed as an impossibility. Thus the augmented role of sampling, not only further reduces the possibility of misuse, but also provides all those concerned with a full count additional grounds to reassure a sometimes skeptical public that it is safe to cooperate with the census.

I would be happy to supplement this letter with further information, including relevant research studies that I have published, if you thought it would be useful. However, given that the justifications for the proposed rule advance here seem straightforward, I believe that the present letter should suffice.

With kind regards.

Sincerely yours,



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