



May 27, 2008

Diana Hynek
Departmental Paperwork Clearance Officer
Department of Commerce, Room 6625
14th and Constitution Avenue NW
Washington, DC 20230

Dear Mrs. Hynek:

I am writing you on behalf of the Puerto Rico Institute of Statistics, in response to the comment request published in the Federal Register (Vol. 73, No. 59, FR Doc. E8-6047) on March 26, 2008 by the Census Bureau, Department of Commerce (“the Agency”). We are a Puerto Rico government organization, charged with the responsibility of ensuring universal and timely access to reliable and complete statistical information on the archipelago of Puerto Rico. We are particularly appreciative of the opportunity offered by the Department of Commerce and the Census Bureau in this occasion to comment on the ways to enhance the quality, utility, and clarity of the information to be collected for the 2010 Decennial Census.

On May 22, 2008, the Puerto Rico Institute of Statistics held a roundtable with a diverse group of local government agencies, academics and Census data users. The resulting discussion generated some of the comments presented below in three topic areas.

I. Issues related to the bilingual English/Spanish questionnaire DX-61 (E/S)

For the 2010 Decennial Census, the Agency proposes to use the bilingual English/Spanish questionnaire DX-61(E/S) in some areas, including Puerto Rico. These questionnaires undergo considerable field testing before they are launched in a broad information collection such as the Constitutionally-mandated Decennial Census. Nevertheless, we find some of the Spanish portions of the questionnaire to be potentially misleading for Spanish speakers, particularly for those residing in Puerto Rico.

For instance, in the instructions to question #3 of DX-61 (E/S), “home equity loan” is translated as “préstamos sobre el valor líquido de la casa.” This translation lends itself to much confusion, since the term “valor líquido” is devoid of meaning in Spanish and therefore cannot be used as a useful translation of “liquid value.” We recognize that as a relatively new debt instrument “home equity loans” may be translated in many different ways across Spanish speaking communities in the United States and in Puerto Rico. This is why the Puerto Rico Institute of Statistics sought the translation used by the Federal Reserve System: “Préstamo con Garantía Hipotecaria.” We believe this translation avoids the confusion created by the current translation.

The instructions to question #1 of DX-61(E/S) also raise concerns, particularly where respondents are told: “No cuente a alguien que no vive aquí por estar en la universidad o en las Fuerzas Armadas” as a translation of “Do not count anyone living away either at college or in the Armed Forces.” We understand that in the United States it is commonplace for university

blending across racial groups. Some also felt the question was inherently racist, discriminatory, and divisive, and suspected a hidden political agenda...Most participants reluctantly settled for what they believed was a wholly inadequate definition of race as skin color...Taking their lead from the national origin terms in the second half of the question, some participants chose to define race as nationality.”

One of the report’s recommendations was:

“For Puerto Rico, to avoid confusion, it is better that the race question not include ‘national origin’ responses. In addition, it might be worthwhile to consider using a different or modified version of the race question for Puerto Rico rather than using the stateside version.”

As best as we can tell, to date, none of the report’s recommendations have been incorporated into the Agency’s plans for the 2010 Decennial Census. As a result, we fear some of the same mistakes from 2000 will be repeated. In order for the information collected on race in Puerto Rico to be of practical value, we recommend the Agency adopt some of the recommendations contained in its own evaluation report.

Otherwise, we believe the question should be replaced with one that yields information of practical value for Puerto Rico. Roundtable participants expressed interest in gathering information on education, particularly literacy in English and other languages.

We hope the Agency finds these comments useful and that they be taken into consideration in the implementation of the 2010 Decennial Census. For more information, please do not hesitate to contact the Puerto Rico Institute of Statistics at (787) 993-3336. We would be happy to work with the Agency.

Sincerely,

A handwritten signature in black ink, appearing to read "Dr. M. Marazzi-Santiago", enclosed within a hand-drawn oval.

Dr. Mario Marazzi-Santiago
Executive Director
Puerto Rico Institute of Statistics