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PUERTO RICO

Congress of the United States
House of Representatives
Washington, DC 20515

COMMITTEE ON NATURAL RESOURCES
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INDIAN AND INSULAR AFFAIRS
OVERISGHT AND INVESTIGATIONS
COMMITTEE ON HOMELAND SECURITY
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COUNTERTERRORISM AND INTELLIGENCE
EMERGENCY MANAGEMENT AND TECHNOLOGY

November 2, 2026

U.S. Census Bureau
U.S. Department of Commerce
4600 Silver Hill Road
Washington, DC 20746

Submitted electronically via the Federal eRulemaking Portal (www.regulations.gov)

RE: COMMENT OF THE RESIDENT COMMISSIONER OF PUERTO RICO ON THE PROPOSED RULE, "DECENNIAL CENSUS OF THE POPULATION OF AMERICANS; PROPOSED RESIDENCE CRITERIA AND PROPOSED REGULATIONS FOR DEMOGRAPHIC QUESTIONS," 91 FED. REG. 57, 524 (SEPT. 10, 2026); DOCKET NO. USBC-2026-0628, RIN 0607-AA75

To the U.S. Census Bureau:

I write as the Resident Commissioner of Puerto Rico to submit formal comments regarding the U.S. Census Bureau's proposed rule, "Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions", published in the Federal Register on September 10, 2026.[1]

On October 19, 2026, I joined congressional colleagues in expressing opposition to the proposed rule and calling for its withdrawal, citing concerns regarding its constitutional implications, proposed residence criteria, reliance on administrative records, and restrictions on demographic data collection. This separate submission focuses on the rule's potential consequences for Puerto Rico and Puerto Rican communities throughout the United States.

Although Puerto Rico does not participate in congressional apportionment among the states, federal law requires its inclusion in the decennial census. Accurate population and demographic information is essential to the Commonwealth's legislative redistricting, municipal planning, disaster preparedness, and federal program administration. Puerto Rico's distinct tax framework,

[1] Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions, 91 Fed. Reg. 57,524 (Sept. 10, 2026) (proposed 15 C.F.R. pts. 60, 70).

residential addressing practices, and population mobility raise questions about how the proposed regulations would operate in the Commonwealth.

The Census Bureau's 2020 Post-Enumeration Survey estimated that approximately 217,000 Puerto Rico residents, or 7.1% of the survey-estimated household population, were omitted from the census. These findings highlight the importance of evaluating whether the proposed residence criteria and administrative record methodologies could exacerbate existing enumeration challenges.

Accordingly, I request that the Bureau clarify how the proposed regulations would apply to Puerto Rico, evaluate their potential effects on enumeration completeness and geographic accuracy, and establish appropriate safeguards before adopting any changes that could affect the Commonwealth's census information.

I. APPLICATION OF THE PROPOSED RESIDENCE CRITERIA TO PUERTO RICO (15 CFR PART 60)

A. The Bureau Must Clarify the Application of the Proposed Residence Criteria to Puerto Rico

Proposed Part 60 establishes residence criteria for determining whether and where individuals are counted, while proposed Part 70 addresses demographic data collection. However, the proposed regulations do not clearly explain their applicability to Puerto Rico, which is included in the decennial census pursuant to 13 U.S.C. § 191(a) but does not participate in apportionment among the states.[2] Although Puerto Rico's population count does not determine congressional representation, accurate and comprehensive census data remains essential for federal program administration, legislative redistricting, municipal planning, and resource allocation throughout the Commonwealth.

Given Puerto Rico's distinct circumstances, changes to residence criteria and demographic data collection warrant specific consideration. In particular, residence determinations involving individuals moving between Puerto Rico and the states may affect how populations are counted and geographically assigned. Similarly, changes to demographic data collection could have implications for the availability and comparability of information used by federal and Commonwealth agencies, municipalities, and other entities responsible for planning and administering public programs. These considerations underscore the importance of ensuring that the proposed regulations account for Puerto Rico's circumstances and do not inadvertently compromise the reliability or utility of its census data.

I therefore request that the Bureau clarify how proposed Parts 60 and 70 would apply to Puerto Rico, identify any Commonwealth-specific procedures or exceptions, and assess their potential effects on the accuracy, completeness, and comparability of the Commonwealth's population and demographic data.

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[2] 13 U.S.C. § 191(a); Final 2020 Census Residence Criteria and Residence Situations, 83 Fed. Reg. 5,525, 5,526 n.1, 5,533 n.9 (Feb. 8, 2018).

B. Reliance on Federal Tax Records May Produce Inaccurate Residence Determinations

The proposed residence criteria contemplate the use of tax and other administrative records to assist in establishing an individual's usual residence. This approach requires particular consideration in Puerto Rico, where residents are subject to a distinct federal and Commonwealth income tax framework.Under applicable federal tax rules, bona fide residents of Puerto Rico whose income is derived entirely from Puerto Rico sources generally are not required to file a federal individual income tax return, although important exceptions apply. Many residents instead report their income through Puerto Rico's Department of the Treasury (*Departamento de Hacienda*), using Commonwealth income tax documentation. [3]
Consequently, the absence of a federal individual income tax return does not necessarily indicate that an individual lacks a valid residence in Puerto Rico. Moreover, federal tax records may not consistently reflect an individual's physical residential location, particularly when mailing addresses, including post office boxes, differ from where individuals ordinarily reside.

These circumstances raise methodological concerns regarding the completeness and reliability of administrative records used to determine usual residence. Individuals whose income or residential information is not fully captured in federal databases may be more difficult to identify or accurately assign to a geographical location. Although the available research does not establish that the proposed rule would exclude these individuals, these potential limitations warrant further evaluation, particularly regarding whether Commonwealth tax records could supplement federal administrative data and improve the accuracy of residence determination.

Accordingly, I request that the Census Bureau:

1. Explain whether and how Puerto Rico income tax records, including Form 499R-2/W-2PR and other Commonwealth wage statements, would be incorporated into residence determinations under proposed § 60.2(a), and identify the legal authority, data-sharing arrangements, and safeguards governing their use. [4]
2. Confirm that the absence of a federal individual income tax return will not, by itself, be treated as evidence that an individual lacks a valid residence in Puerto Rico.
3. Evaluate the completeness, reliability, and geographic accuracy of administrative records used to identify and assign Puerto Rico residents to their usual residences.
4. Preserve self-response and field enumeration as essential methods for establishing usual residence, particularly when administrative records are incomplete or inconsistent.
5. Publish a Puerto Rico-specific assessment of the limitations and coverage of federal and Commonwealth administrative records before implementing the proposed methodology.

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[3] 26 U.S.C. § 933(1); Internal Revenue Service, Publication 1321, Special Instructions for Bona Fide Residents of Puerto Rico Who Must File a U.S. Individual Income Tax Return (rev. Oct. 2025).
[4] Internal Revenue Service, Form W-3 (PR), Transmittal of Withholding Statements (2026) (addressing Forms 499R-2/W-2PR); 13 U.S.C. § 6(b).

C. Puerto Rico's Residential Addressing System Requires Specific Accommodations

The proposed residence criteria also raise significant concerns regarding the use of administrative records to identify and verify residential locations.

Puerto Rico has longstanding challenges involving the standardization and validation of physical addresses. In many communities, particularly rural areas, residential locations may be identified through highway routes, kilometer markers, urbanization names, rural routes, or other geographic references rather than conventional street names and building numbers. The United States Postal Service recognizes specific addressing conventions for Puerto Rico and the U.S. Virgin Islands. These circumstances also underscore the importance of ensuring that the Census Bureau's geographic partnership programs, including the Local Update of Census Addresses (LUCA), adequately accommodate Puerto Rico's distinctive addressing practices.[5]

The Census Bureau's 2010 Puerto Rico assessment reported that 36% of Master Address File units had non-city-style addresses at the start of census operations and 25% at the end. These are historical 2010 MAF classifications, not estimates of the current share of homes lacking a standardized or verifiable address. Prior Bureau research also documents the difficulty of matching non-city-style addresses to administrative records.[6,7]

Additionally, the Census Bureau and the Department of Housing and Urban Development have identified difficulties associated with locating post office box and highway contract addresses through digital mapping systems.

These challenges are documented in reporting by the Centro de Periodismo Investigativo, Associated Press, and other organizations, which have described how residents of communities without standardized street names or physical addresses encounter difficulties with identification, delivery services, and access to public and private services.

Local initiatives, including the Initiative for Civic Address Systems Assessment in Puerto Rico (iCasaPR), have sought to develop tools and methods to improve the identification and location of residential structures.

These documented conditions raise a specific methodological question regarding the proposed rule: whether administrative databases and automated address-matching procedures can reliably identify the usual residence of individuals whose physical addresses do not conform to conventional federal data formats.

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[5] U.S. Census Bureau, Local Update of Census Addresses (LUCA) Operation (updated Aug. 12, 2026); U.S. Postal Service, Publication 28, Postal Addressing Standards, § 295.5.

[6]U.S. Census Bureau, 2010 Census of Puerto Rico Assessment Report, 2010 Census Planning Memoranda Series No. 238, at xi–xii, 31 (Sept. 18, 2012).

[7] Christine Gibson Tomaszewski, Updating the U.S. Census Bureau's Master Address File via Administrative Records, JSM Proceedings, Government Statistics Section 3638, 3640–43 (2013); U.S. Census Bureau, Minimum Address Data Submission Guidelines – Puerto Rico.

A mailing address is not necessarily a physical residential address. Similarly, the inability to match an address to an administrative database does not establish that a household does not exist or that an individual does not reside at that location.

An inaccurate geographic assignment could affect not only aggregate population counts but also the distribution of residents among municipalities, barrios, census tracts, and census blocks. Such errors could have implications for municipal planning, emergency response, public infrastructure, and legislative redistricting.

Although the available evidence establishes that residential addressing challenges exist in Puerto Rico, it does not independently determine how many individuals would be incorrectly classified under the proposed rule. Any such impact would depend on the Bureau's actual implementation methodology.
I therefore request that the Census Bureau:

1. Conduct and publish a Puerto Rico-specific assessment of the reliability of address-matching and geolocation procedures.
2. Explain how rural routes, highway contract addresses, post office boxes, and nonstandard physical descriptions would be treated when verifying usual residence.
3. Confirm that an unsuccessful automated address match will not independently result in exclusion from enumeration.
4. Maintain adequate field verification and in-person enumeration procedures for households whose locations cannot be established through administrative records.
5. Ensure that geographic partnership programs, including the Local Update of Census Addresses (LUCA), accommodate Puerto Rico's addressing practices.
6. Consult with municipal governments, geographic information specialists, and organizations working to improve Puerto Rico's civic addressing infrastructure.

The Bureau should demonstrate that its proposed verification methodology can accurately identify and locate households in Puerto Rico before relying on that methodology for the 2030 Census.

D. The Proposed Enumeration Period Must Account for Mobility Between Puerto Rico and the States

The proposed residence criteria also raise questions regarding individuals who maintain connections to Puerto Rico while temporarily residing in a state, or who move between jurisdictions for employment, education, medical treatment, family responsibilities, or other reasons. These circumstances are particularly relevant given the movement of people between Puerto Rico and the mainland United States.

Proposed § 60.2 measures days between January 3 and April 1, counting at least one hour of lawful physical presence as a day. Puerto Rico's Institute of Statistics estimated that in 2024 approximately 38,000 people moved from Puerto Rico to the states and approximately 24,000 moved from the states to Puerto Rico. These annual migration estimates do not measure all

temporary or circular movements, reinforcing the need for a clear rule for split residence, ties, and displacement.[8]

A residence determination based on physical presence during a specified period could, depending on its implementation, produce a different geographic assignment than a determination based on an individual's usual place of residence.

The Bureau should explain how its proposed methodology would apply to individuals who move between Puerto Rico and the states during the enumeration period, including how it would prevent duplicate enumeration or erroneous geographic assignment.

The Bureau should also address circumstances involving temporary displacement following hurricanes, earthquakes, or other emergencies. Puerto Rico's recent experience with major disasters underscores the importance of maintaining clear and consistent residence criteria for individuals temporarily displaced from their usual homes.

I request that the Bureau provide specific guidance for circular migration, temporary absence, and disaster-related displacement, and explain how its proposed approach would preserve consistency between Puerto Rico's enumeration and the enumeration of residents in the states.

II. PROPOSED RESTRICTIONS ON DEMOGRAPHIC QUESTIONS (15 CFR PART 70)

A. Eliminating Race and Ethnicity Questions Would Affect the Identification of Puerto Rican Communities

The proposed rule would restrict the collection of certain demographic information, including race and ethnicity, through the decennial census. For Puerto Rico, the implications extend beyond the general importance of demographic data for civil rights enforcement and federal program administration.

Historically, the Census Bureau's collection of Hispanic or Latino origin information has included a category identifying individuals of Puerto Rican origin. This information provides an important means of identifying Puerto Rican communities both within Puerto Rico and throughout the fifty states and the District of Columbia.

The distinction is especially relevant for individuals of Puerto Rican origin born outside Puerto Rico. Birthplace information alone cannot identify second-generation, third-generation, or subsequent generations of Puerto Rican origin residing in the states.

Eliminating the relevant demographic questions from the decennial census could therefore reduce the availability of comprehensive and geographically detailed information concerning these communities.

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[8] Instituto de Estadísticas de Puerto Rico, Perfil del Migrante 2023–2024, at 5–6, 15, 39 tbl. A1 (Apr. 29, 2026); proposed 15 C.F.R. § 60.2(a)–(c), 91 Fed. Reg. at 57,529.

Although the American Community Survey (ACS) and Puerto Rico Community Survey (PRCS) collect demographic information, these surveys are not complete substitutes for the decennial census. The PRCS provides annual demographic, social, economic, and housing information for Puerto Rico, and its estimates form part of the broader federal statistical system.

Puerto Rico's experience also illustrates the need for continuity: the proportion identifying as White alone changed from 75.8% in 2010 to 17.1% in 2020. Because Census Bureau methodological changes affect comparability, this shift should not be interpreted solely as a change in racial self-identification. A comparable 2030 benchmark is particularly important.[9,10]

Changes to decennial demographic data collection may have implications for the availability, comparability, and geographic detail of information produced through related surveys. I request that the Census Bureau evaluate these implications before eliminating demographic questions and explain how it would preserve reliable identification of Puerto Rican populations across jurisdictions.

B. Reliable Demographic Data Are Essential to Public Policy and Civil Rights Analysis

Race and ethnicity data serve important governmental purposes, including evaluating equal access to public programs, identifying disparities in health and education, and supporting the administration of applicable civil rights protections. In Puerto Rico, these data allow researchers and public officials to examine differences among communities and assess whether public programs are reaching their intended populations.

Eliminating these questions from the decennial census could reduce the availability of detailed and comparable demographic information, particularly for smaller geographic areas.

The Bureau has identified privacy and confidentiality concerns associated with sensitive demographic information. Such concerns warrant careful consideration, but they should be evaluated alongside the legitimate statistical and governmental purposes served by collecting the information.

Proposed § 70.3(b) additionally warrants a Puerto Rico-specific explanation of whether the Commonwealth would be treated as the "state level" for purposes of disclosure avoidance and how the Bureau would preserve access to reliable demographic information at the municipio, barrio, census-tract, and census-block levels. The Bureau should also evaluate retaining race and Hispanic-origin questions for Puerto Rico as a regulatory alternative and explain how any proposed disclosure protection methodology would affect the availability and comparability of small-area demographic data.[11]

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[9] Damayra Figueroa-Lazu, Jennifer Hinojosa & Yarimar Bonilla, Puerto Rico's 2020 Race/Ethnicity Decennial Analysis (2022); U.S. Census Bureau, 2020 Census Redistricting Data, tbl. P1 (Puerto Rico); Nicholas Jones et al., 2020 Census Illuminates Racial and Ethnic Composition of the Country (Aug. 12, 2021).

[10] U.S. Census Bureau, Puerto Rico Community Survey: Accuracy of the Data (2024), at 6, 11, 15–16; proposed 15 C.F.R. §§ 70.2–70.4, 91 Fed. Reg. at 57,530.

[11] **.** U.S. Census Bureau, Preliminary Regulatory Impact Analysis, Docket USBC-2026-0628-0002, at 12–17 (Sept. 10, 2026); proposed 15 C.F.R. § 70.3(b), 91 Fed. Reg. at 57,530.

Title 13 of the United States Code establishes confidentiality protections governing census information, including restrictions on the disclosure of personally identifiable responses.

The Bureau should explain why existing or alternative disclosure protection methods would be insufficient to address the identified concerns without eliminating the collection of demographic information. I request that the Bureau retain the ability to collect statistically useful demographic data, subject to appropriate confidentiality protections, and assess the consequences of the proposed restrictions for Puerto Rico and Puerto Rican communities throughout the United States.

III. CONSEQUENCES FOR FEDERAL PROGRAM ADMINISTRATION AND RESOURCE ALLOCATION

Census data are essential to the administration of federal programs serving Puerto Rico. Population counts and demographic estimates are used, directly or indirectly and in different ways, to determine eligibility, evaluate community needs, support funding formulas, and guide the distribution and oversight of federal resources.

The Census Bureau has documented the extensive use of decennial census data in the distribution of federal funds across hundreds of federal assistance programs.

According to Census Bureau research, 353 federal assistance programs relied, in whole or in part, on Decennial Census Programs data to inform the distribution of more than $2.8 trillion in federal funding nationwide during fiscal year 2021. Although this figure does not represent funding allocated to Puerto Rico, it underscores the importance of accurate and reliable census data in federal resource allocation and the potential implications of enumeration inaccuracies for programs serving the Commonwealth. [12]

For Puerto Rico, census-derived information is relevant to public policy areas including health care, education, nutrition assistance, housing, transportation, and disaster recovery.

The relationship between census information and funding varies by program. Some programs serving Puerto Rico operate under statutory funding caps, Commonwealth allocations, or other mechanisms that differ from those applicable to states. Therefore, it would be inaccurate to assume that every change in Puerto Rico's population count would produce a proportional change in federal funding.

Nevertheless, inaccurate population information could affect the statistical basis used to evaluate program needs, calculate certain allocations, and assess the adequacy of federal support.

The Bureau should not assume that a methodology developed primarily around congressional apportionment among the states will have equivalent effects when applied to Puerto Rico. Before adopting the proposed regulations, the Bureau should conduct a Commonwealth-specific analysis identifying the federal statistical products and program-related data that could be affected.

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[12] Ceci Villa Ross, U.S. Census Bureau, Uses of Decennial Census Programs Data in Federal Funds Distribution: Fiscal Year 2021 (June 2023); U.S. Department of Housing and Urban Development, Notice CPD-24-04, Low- and Moderate-Income Summary Data Updates (June 6, 2024).

That analysis should distinguish between direct effects on funding formulas and indirect consequences for planning, eligibility estimates, and program administration.

IV. IMPLICATIONS FOR PUERTO RICO'S LEGISLATIVE REDISTRICTING AND MUNICIPAL PLANNING

Although Puerto Rico does not receive voting representation in the House of Representatives through congressional apportionment, decennial census information plays an essential role in the Commonwealth's representative institutions.

Article III of the Constitution of Puerto Rico establishes the framework for legislative districts and provides for their periodic review following each decennial census. Puerto Rico's legislative structure includes eight senatorial districts and forty representative districts.
The constitutional requirement for periodic review of legislative districts is independent of Puerto Rico's exclusion from voting-seat apportionment among the states. Geographic misassignment can therefore matter even when the Commonwealth-wide total is unchanged.[13]

The Constitutional Board for the Revision of Senatorial and Representative Districts conducted its most recent redistricting process following the 2020 Census and issued its final determination in 2022.

The accuracy of population information at the municipal, neighborhood, census-tract, and census-block levels is therefore essential to the process of reviewing legislative district boundaries.

If the proposed residence criteria result in individuals being counted at incorrect geographic locations, the resulting errors could affect the population figures used in Puerto Rico's legislative redistricting process. Municipalities also rely on detailed census information to plan infrastructure, evaluate demographic changes, and allocate public resources.

For this reason, the Bureau should assess not only the potential effect of the proposed rule on Puerto Rico's aggregate population count, but also its consequences for geographic accuracy across the Commonwealth's 78 municipalities.

I request that the Bureau preserve the availability and statistical utility of appropriately protected data at the municipal, barrio, census-tract, and census-block levels.

V. THE BUREAU SHOULD INCORPORATE THE FINDINGS OF THE 2020 POST-ENUMERATION SURVEY INTO ITS ASSESSMENT OF THE PROPOSED RULE

The Census Bureau's 2020 Post-Enumeration Survey estimated that approximately 217,000 Puerto Rico residents, or 7.1% of the survey-estimated population, were omitted from the census. These findings highlight the importance of evaluating how the proposed changes to usual residence

[13] P.R. Const. art. III, § 4; Junta Constitucional de Revisión de los Distritos Senatoriales y Representativos de Puerto Rico, Principios para la Revisión de los Distritos Senatoriales y Representativos (Nov. 16, 2021).

criteria, particularly the consideration of physical presence and administrative records, would operate in Puerto Rico, where nonstandardized residential addresses and differences between physical and mailing addresses present distinct enumeration challenges.

In particular, reliance on administrative records that may not accurately reflect an individual's physical residence could increase the risk of omissions, misclassification of residents moving between Puerto Rico and the states, or inaccurate geographic assignments. Such errors could affect municipal and census-block population counts, with implications for local planning, legislative redistricting, and federal program administration.

Accordingly, I request that the Bureau conduct and publish a Puerto Rico-specific assessment incorporating the 2020 Post-Enumeration Survey findings. This assessment should evaluate the reliability of administrative and residential address records and identify specific safeguards, including independent verification of residence information, procedures for resolving conflicting or incomplete records, alternative enumeration methods for households with nonstandardized addresses, and validation of geographic assignments at the municipal and census-block levels. The Bureau should also explain how these measures would prevent additional omissions and ensure the completeness and accuracy of Puerto Rico's census data.

VI. REQUEST FOR PUERTO RICO-SPECIFIC ANALYSIS AND CONSULTATION

The proposed regulations present significant legal, statistical, and operational questions that warrant transparent analysis and meaningful consultation. Puerto Rico's distinct tax framework, residential addressing practices, population mobility, and dependence on reliable federal statistical information require specific consideration.

Accordingly, I request that the Census Bureau undertake the following actions before finalizing the proposed regulations:

1. **Clarify applicability and implementation in Puerto Rico.** Explain how proposed Parts 60 and 70 would apply to Puerto Rico, identify any Commonwealth-specific procedures or exceptions, and clarify how their implementation would fulfill the statutory requirement to enumerate Puerto Rico while maintaining accurate and reliable population and demographic data.

2. **Assess administrative record reliability.** Conduct and publish a Puerto Rico-specific assessment of the completeness, accuracy, and reliability of federal and Commonwealth tax records, wage statements, and other administrative data used to determine usual residence. This assessment should address potential gaps in coverage, particularly among individuals who do not file federal income tax returns or whose employment and residential information is not adequately reflected in administrative records.

3. **Establish safeguards for residence verification and enumeration.** Confirm that the absence of federal tax records or an unsuccessful automated address match will not, by itself, result in exclusion from enumeration. Establish procedures for resolving incomplete

or conflicting records, accommodating nonstandard residential addresses, and preserving self-response, field verification, and alternative enumeration methods.

4. **Address population mobility and temporary displacement.** Clarify how the proposed residence criteria would apply to individuals moving between Puerto Rico and the states, including those temporarily absent for employment, education, medical treatment, or disaster-related displacement. Identify measures to minimize omissions, duplicate enumeration, and incorrect residence assignments.

5. **Evaluate demographic data impacts.** Assess how the proposed changes to race and Hispanic-origin questions could affect the identification of Puerto Rican populations in Puerto Rico and the states, the comparability of historical demographic data, and the availability of reliable information through the American Community Survey (ACS), Puerto Rico Community Survey (PRCS), and related statistical products. Consider retaining these questions as a regulatory alternative.

6. **Examine implications for federal programs.** Identify federal programs and statistical products that could be affected by changes to Puerto Rico's population counts or demographic data, distinguishing potential direct effects on funding formulas from indirect implications for eligibility determinations, resource allocation, planning, and program administration.

7. **Protect geographic accuracy and small-area data.** Evaluate the potential effects of the proposed residence criteria and disclosure protections on geographic population assignments and the availability of reliable data at the municipal, barrio, census-tract, and census-block levels. Particular attention should be given to the implications for legislative redistricting, emergency management, and municipal planning.

8. **Incorporate findings from prior enumeration efforts.** Consider the findings of the 2020 Post-Enumeration Survey in evaluating whether the proposed methodology could contribute to population omissions, duplicate enumeration, or geographic misclassification in Puerto Rico. Identify appropriate safeguards, including independent residence verification, validation of geographic assignments, and procedures for households with nonstandard addresses.

9. **Ensure meaningful consultation and transparency.** Consult with the Puerto Rico Institute of Statistics, Puerto Rico Planning Board, municipal governments, academic institutions, demographic experts, and organizations with expertise in residential addressing and census participation. Publish relevant methodologies, Puerto Rico-specific impact assessments, and supporting evidence, and provide an opportunity for public review before finalizing the regulations.

These actions are necessary to establish a transparent record of how the proposed regulations would affect Puerto Rico and to ensure that any final rule adequately addresses the Commonwealth's distinct enumeration, geographic, and demographic circumstances.

VII. CONCLUSION

The decennial census is one of the federal government's most consequential statistical undertakings. Its accuracy is essential not only to representation, but also to effective public administration and the ability of governments to understand and serve their populations.

For Puerto Rico, the consequences of inaccurate enumeration or reduced demographic information could extend across federal program administration, municipal planning, legislative redistricting, and the statistical visibility of Puerto Rican communities throughout the United States.

The proposed regulations do not sufficiently address these distinct circumstances. As the elected representative of Puerto Rico in Congress, I respectfully request that the Census Bureau give full consideration to the Commonwealth-specific concerns outlined in this comment and refrain from finalizing the proposed changes without first resolving their legal, methodological, and operational implications for Puerto Rico.

Thank you for the opportunity to submit these comments. I look forward to the Bureau's substantive consideration of these issues as part of the administrative rulemaking record.

Sincerely,



Pablo José Hernández Rivera
Member of Congress
Resident Commissioner of Puerto Rico