

July 15, 2016  
via email: [POP.2020.Residence.Rule@census.gov](mailto:POP.2020.Residence.Rule@census.gov)

Eric Lotke  
253 N. Columbus Street  
Arlington, VA 22203  
(202) 277-4599  
[ericlotke2044@gmail.com](mailto:ericlotke2044@gmail.com)

**RE: RESIDENCE RULE AND RESIDENCE SITUATIONS, 81 FR 42577 (JUNE 30, 2016)**

To Karen Humes:

I am writing in regards to the federal register notice on *Residence Rule and Residence Situations*, 81 FR 42577 (June 30, 2016). I urge you adjust the Usual Residence rule to count incarcerated people at their home address, not where they happen to be located on Census Day.

The Census Bureau is an honest agency and an extraordinary source of information. I am a professional researcher and I use Census data regularly. I'm disappointed that the Bureau continues to use the old rule, now that the problems have become so clear.

As you know, the median time served in most prisons is roughly four years, far less than the decennial census. As you may also know, people move around regularly within the system, staying in any particular prison for only part of their terms.

(People are moved to adjust capacity, as some facilities become crowded while others have extra space; they are moved to accommodate protection orders, as co-defendants or witnesses enter or exit the system, and individuals must be confined separately from each other; and they are moved to accommodate medical needs, court dates, parole hearings or any number of other internal administrative events).

The Census Bureau can not and should not try to track movements in this way. The Bureau should enumerate people who are temporarily confined in the location they consider their homes, and in the neighborhood to which they will return long before the next census. It is most accurate and most fair.

Thank you for your time and attention. You can do better.  
Eric Lotke