

Drew Kukorowski  
825 Herrin Ave.  
Charlotte, NC 28205

8 July 2015

Ms. Karen Humes  
Chief, Population Division  
U.S. Census Bureau  
Room 5H174  
Washington, D.C. 20233

**Re: 80 FR 28950, Residence Rule Change**

Dear Ms. Humes:

As a member of the board of directors of the Prison Policy Initiative, and as a resident of a state in which the current Residence Rule distorted election district boundaries, I submit this comment in response to the Census Bureau's federal register notice regarding proposed changes to the Residence Rule and Residence Situations as outlined in 80 FR 28950 (May 20, 2015).

By designating a prison cell as a residence in the 2010 Census, the Census Bureau concentrated a population that is disproportionately male, urban, and Black or Latino into 5,393 census blocks that are located far from the actual homes of incarcerated people. When the PL 94-171 data are used for redistricting purposes, as is almost always the case, prison populations unfairly inflate the political power of people who live near prisons.

In my home state of North Carolina, two counties removed the prison populations tabulated in the PL 94-171 data when they conducted redistricting for local government, thereby avoiding inflating the political clout of people who lived in the county districts that contained the prisons. On the other hand, one county commission district and school district in Granville County, NC is heavily underpopulated due to the county's decision to rely on the PL 94-171 data for redistricting, which counted the people incarcerated in the county as if they resided in the county. (Granville County is home to a massive federal prison complex, the population of which was included in county election district redistricting and state legislative district redistricting.) The former are examples of the lengths to which local governments must go to

adjust data effected by the Residence Rule, and the latter is an example of the political distortion that the Residence Rule causes when local governments rely on the PL 94-171 data provided by the Census Bureau.

Thank you for the opportunity to comment on the proposed changes to the Residence Rule and Residence Situations. As a board member of an organization that has been studying the effect of the Residence Rule on prison populations and redistricting for more than a decade, and as a resident of a state in which the Residence Rule impacts election district boundaries, I respectfully urge the Census Bureau to count incarcerated people as residents of their last home address.

Best,

/s/Drew Kukorowski  
825 Herrin Ave.  
Charlotte, NC 28205  
andrew.kukorowski@gmail.com