



**NEW  
JERSEY  
TENANTS  
ORGANIZATION**

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July 8, 2015

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

Dear Karen Humes,

The New Jersey Tenants Organization (NJTO) submits this comment in response to the Census Bureau's federal register notice regarding the Residence Rule and Residence Situations , 80 FR 28950 (May 20, 2015). We urge you to count incarcerated people at their home address, rather than at the particular facility that they happen to be located at on Census day.

The NJTO is the oldest, largest statewide tenant membership organization in the United States. Over the last 46 years, NJTO has changed New Jersey from one of the worst states for tenants to (arguably) the best. NJTO has been successful in establishing the basic rights of tenants to organize and be treated as human beings with the right to safe, healthy, and affordable homes, rather than just lessees at the mercy of lessors. We have also been the driving force behind the movement for municipal rent control in New Jersey.

But our efforts to ensure fair tenant laws are hindered when communities are shortchanged on representation. When the Bureau routinely publishes redistricting data that counts our incarcerated residents as if they lived across the state, it shifts political power, and consequently shifts our legislature's priorities.

We commend the Bureau for striving to count everyone in the right place and thank you for this opportunity to comment on the residence rules. NJTO believes our state, and the nation, needs a population count that accurately represents all communities, so we urge you to count incarcerated people as residents of their home address.

Sincerely yours,

Matthew B. Shapiro  
President