AAPOR
AMERICAN ASSOCIATION FOR PUBLIC OPINION RESEARCH

1436 Duke Street, Alexandria, VA 22314 703-827-1887 www.aapor.org

October 28, 2026

Re: Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions (Docket No. 260903-0005)

To whom it may concern:

The American Association for Public Opinion Research (AAPOR) submits these comments on the proposed rule, "Decennial Census of the Population of Americans: Proposed Residence Criteria and Proposed Regulations for Demographic Questions," strongly urging the U.S. Commerce Department to reject the proposal to eliminate the race and ethnicity questions on the 2030 Census.

AAPOR is the leading professional association of public opinion and survey research professionals. We are committed to promoting high standards of research quality, transparency, and integrity, and to ensuring that reliable data are available to inform research, public policy, and decision-making.

AAPOR members rely on accurate, comprehensive census data to design representative surveys, develop population weights, and produce reliable estimates of the U.S. population. Changes to the collection of race and ethnicity data in the decennial census would have significant implications for the quality and accuracy of public opinion and survey research nationwide.

While the changes would have significant, wide-ranging political, societal, and state funding impacts, for AAPOR specifically, the proposed changes to the constitutionally mandated enumeration would also fundamentally undermine research professionals' ability nationwide to gather the data needed to accurately understand communities, issues, and activities. Removing these questions would compromise survey professionals' ability to conduct population weighting and produce unbiased population estimates.

Consequences for Public Opinion and Survey Research

This would negatively affect all U.S. and state-level surveys, including federal and state government surveys, public health surveillance, pre-election polls, and market research. All of these important research efforts rely on census denominators for critical weighting and calibration. Based on decades of work by our members, we know that public opinion, health, employment, and a host of other measures vary by race/ethnicity.

Regardless of differing perspectives on the use of race and ethnicity as demographic classifications, the fact is that the measures we collect and study do vary by that characteristic. If we are unable to ensure the appropriate representation of racial and ethnic groups in the data we acquire and in our population

weights (because we do not know what the appropriate representation should be), then our estimates will likely be biased.

For public health and community needs assessments and economic development, for example, we need to know the race/ethnicity denominators for the overall populations and about subpopulations to understand a range of metrics like incidence rates, mortality rates, fertility rates, employment rates, temporary and permanent residents, etc. When faulty decisions are made with biased data, the value of that data diminishes, and our profession is called into question.

Broader Effects on Research and Data Infrastructure

Beyond compromising the quality of surveys about the American population, removing these items would increase costs across sectors and further undermine trust in research.

Reliable census benchmarks support the work of nearly one million market research analysts across the United States, helping businesses understand populations, identify opportunities, and make informed investment decisions. It would also weaken the data infrastructure supporting a global market research and insights industry that generated nearly $165 billion in 2025, with the United States accounting for more than $89 billion, making us the world's largest market.

Conclusion

We request that the proposed rule pertaining to the removal of race and ethnicity data collection be withdrawn and that data producers and users be consulted before making substantive, far-reaching changes to the Census. Such a change would weaken the Census's capacity to provide authoritative population benchmarks relied upon by scientists and researchers in the United States and around the world.

Thank you for considering our comments.

Sincerely,

Mary Losch
AAPOR President, 2026–27

Additional companies that have signed on to this letter:

- Generation1.CA
- Research Support Services, Inc.