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Daniel Sweeney
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Office of the General Counsel, US Department of Commerce
Designation: ADDEMO/FRN
4600 Silver Hill Road
Washington, DC 20746

Subject: Response to *Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions*

References: 15 CFR Parts 60 and 70; Docket No. 260903-0005

Dear Mr. Sweeney,

Thank you for the opportunity to comment on the Department of Commerce's proposed residence criteria and proposed regulations for demographic questions for the Decennial Census of the Population of Americans. The Decennial Census is the foundational data resource that underpins the entire US open data ecosystem, and USAFacts uses this data every day when making government data easy to access and understand for the American public.

This comment will focus on the Department's proposed regulations to "prohibit the inclusion of questions about race and ethnicity or sexual orientation on the decennial census short-form questionnaire or any questionnaire used for the purposes of enumeration." As the Department considers the "need for or usefulness of this information," we hope to provide context on the American public's interest in this data with an analysis of what US audiences search for online.

This comment makes two main points:

- There is strong demand for the race, ethnicity, and sexual orientation population data that the Department is considering prohibiting the Decennial Census from collecting: **Over one-in-four of all measurable US-based Google searches including the term "US population" ask for this data by race and ethnicity or sexual orientation**.
- We find that Americans are frequently using government data to seek out information about themselves and their communities. Disaggregating the data by demographic metrics, like race, ethnicity, and sexual orientation, makes the data more useful for the American public.

How USAFacts Uses Government Data

USAFacts is a nonpartisan organization dedicated to making government data more accessible and useful for policymakers and the American public. We believe that a thriving democracy requires undisputed, trusted, and comprehensive government data that is accessible to the public. We produce articles, videos, data visualizations, and a variety of other data products answering questions Americans have about our country. All the information we present to our audience comes only from government data sources, including the Decennial Census.

Public appetite for government data is large and growing: In 2026, usafacts.org has drawn more than 10 million visits, and our Just the Facts videos have been watched 179 million times (420 million times total since launch). Our audience is also committed, with 1.2 million YouTube subscribers and 917,000 newsletter subscribers choosing to hear from us regularly.

Online Searches Asking about the United States Population

USAFacts evaluates data on what Americans are searching for online to identify the topics that are top of mind. This enables us to develop content that responds to the questions Americans are asking about our country and government. Our research may, for instance, show that Americans ask more questions about Social Security following the release of the annual Social Security Trustees Report. We would then use this information to produce content about Social Security to help Americans learn about the program at a time when they care more about it.

For this comment, we analyzed US-based Google searches with variations of the term "US population" to identify demand for this data by race and ethnicity as well as by sexual orientation.

Table 1: 12-month US-based Google searches with terms related to "US population" (October 2025 – September 2026)

Demographic	Percentage of "US Population" Searches
By Race and Ethnicity	24.1%
Black	8.0%
White	4.9%
Hispanic	2.2%
Asian	1.5%
Other race / ethnicity group	0.8%
By race / ethnicity, no group named (e.g., "US population by race")	6.9%
By Sexual Orientation	2.7%

Source: Estimated number of Google searches in the United States Oct 2025–Sep 2026 from Google Ads Keyword Planner (via DataForSEO, pulled October 2026).

Table 1 contains the estimated frequency, over a recent 12-month period, that US-based Google searches with variations of the term "US population" included keywords on race and ethnicity or sexual orientation. The analysis includes both searches that ask for the US population "by race" as well as searches that ask for this information about a specific race (e.g., "black US population").[1]

Our analysis shows that, from October 2025 through September 2026, 24.1% of all measurable US-based Google searches on the US population asked about race or ethnicity. The majority of US

[1] The analysis includes numerous variations of the terms related to race, ethnicity, and sexual orientation. For example, the number of searches for terms related to "black population" also included instances when searches used the term "African American." The "other race and ethnicity group" category includes demographic searches for Native American, Pacific Islander, Arab, Middle Eastern, minorities, and people of color. Note that the subcategories of race and ethnicity sum to 24.3%, more than the 24.1% for all US population searches focused on race and ethnicity. This is because of some instances when searches included multiple races. This could be search terms like "black vs white US population," for example.

population searches about race and ethnicity were for data on a specific race or ethnicity. For instance, 8% of all US population searches asked about the black population. Meanwhile, 6.9% asked for US population by race or ethnicity, without naming a specific group.

Additionally, 2.7% of measurable searches on the US population asked about sexual orientation. Those consisted of population searches that included keywords such as gay, lesbian, transgender, straight, and heterosexual, among others.

Combined, more than one-in-four (26.8%) of all US-based measurable searches with variations of the term "US population" asked about race and ethnicity or sexual orientation.

Demographic Information and Data: Lessons from the USAFacts Future of Data Initiative

In addition to our research on what Americans are searching for online, a recent USAFacts initiative provided valuable insights on the role of demographic data. USAFacts partnered with the Center for Open Data Enterprise (CODE) to envision the future of government data, culminating in the report, *Building the National Data Ecosystem America Deserves*. In this effort, we asked a politically diverse group of over 150 data experts for their views on how the US government data ecosystem should evolve to better serve Americans in the 21st Century. The resulting report provides an aspirational roadmap to modernize government data, covering issues like federal governance, preparing data for AI, leveraging state and local data, and the role of private sector data.

There was broad consensus among experts that government data needs to serve all Americans to maintain the public's interest and investment in the public data ecosystem. Paralleling the results of our online search analysis, the experts emphasized that Americans commonly search for information about themselves and their communities. Government data best serves Americans when it includes information on all demographic backgrounds, including data about race, ethnicity, and sexual orientation. The Department of Commerce's best-in-class data is only made stronger and more useful when it strives to serve all Americans.

Thank you again for the opportunity to comment on the Department of Commerce's proposed regulations. We hope this comment will provide insight into the public's need for robust demographic data. Please feel free to contact us with any questions.

Sincerely,

Ben Gitis
Senior Manager, Data Policy and Advocacy
USAFacts