



August 7, 2018

Ms. Jennifer Jessup
Departmental Paperwork Clearance Officer
Department of Commerce
Room 6616
14th and Constitution Avenue NW
Washington, DC 20230
Email: PRAcomments@doc.gov

Re: Docket number USBC-2018-0005

Dear Ms. Jessup,

On behalf of our respective members, the 4A's, the AAF, the ANA, and the ARF — the major trade associations representing the advertising industry — are jointly writing to express our opposition to the addition of the new census question that asks, “Is this person a citizen of the United States?”

We are concerned that the addition of a citizenship question would depress response among both non-citizens and their families (even if family members are indeed citizens). That runs the risk of non-respondent bias by significantly undercounting immigrant, minority, and low-income populations. If immigrants and others avoid the national head-count, the census results will be flawed.

This raises significant issues in the world of marketing, as flawed results would distort the representation of U.S. population estimates and the research benchmarked to it. Since the census is the foundation for population estimates that support the marketing industry, inaccurate census data would lead to misallocated marketing resources. It could have a particularly negative impact on media that serve multicultural communities, the companies which research them, and the agencies which help advertise to them. The value marketers see in those consumer segments would be understated and investments reduced.

As one of our members stated, *“I believe that undocumented people will not report their presence and therefore the census will be underreported, skewing data, messing up budgets, and providing inaccurate reporting.”*

We respectfully request that this citizenship question NOT be added to the 2020 Census.

Marla Kaplowitz
President and CEO
American Association of Advertising Agencies

James Edmund Datri
President and CEO
American Advertising Federation

Bob Liodice
CEO
Association of National Advertisers

Scott McDonald, Ph.D.
President and CEO
Advertising Research Foundation



About the 4A's

Founded in 1917, the 4A's was established to promote, advance, and defend the interests of our member agencies, their employees, and the industry at large. The organization serves 700+ member agencies across 1,300 offices, which control more than 85% of total U.S. advertising spend. As the leading trade organization for marketing communication agencies, the 4A's purpose is to help empower its members to deliver insightful creativity that drives commerce and influences culture, all while moving the industry forward. The organization provides community, leadership, advocacy, guidance, and best-in-class training that help enable agencies to innovate, evolve, and grow. The 4A's Benefits division insures more than 160,000 employees, and its D.C. office advocates for policies that best support a thriving advertising industry. The 4A's Foundation fuels a robust diversity pipeline of talent for its members and the marketing and media industry, fostering the next generation of leaders. The organization is dedicated to, and vested in, our members' success just as they are dedicated to helping brands create, distribute, and measure effective and insightful advertising and marketing. Visit the 4A's at www.aaa.org.



About the American Advertising Federation

Established in 1905, the American Advertising Federation (AAF), acts as the “Unifying Voice for Advertising.” Its membership is comprised of nearly 100 corporate members made up of the nation's leading advertisers, agencies, and media companies; a national network of nearly 200 local clubs representing 40,000 advertising professionals; and more than 200 college chapters with 5,000 student members. The AAF operates a host of programs and initiatives, including the Advertising Hall of Fame, the Advertising Hall of Achievement, the American Advertising Awards, the National Student Advertising Competition, the Mosaic Center for Multiculturalism, and AdCamps for high school students. For more information, visit www.aaf.org.



About the ANA

The ANA (Association of National Advertisers) makes a difference for individuals, brands, and the industry by driving growth, advancing the interests of marketers and promoting and protecting the well-being of the marketing community. Founded in 1910, the ANA provides leadership that advances marketing excellence and shapes the future of the industry. The ANA's membership includes nearly 2,000 companies with 25,000 brands that engage almost 150,000 industry professionals and collectively spend or support more than \$400 billion in marketing and advertising annually. The membership is comprised of more than 1,100 client-side marketers and more than 800 marketing service provider members, which include leading marketing data science and technology suppliers, ad agencies, law firms, consultants, and vendors. Further enriching the ecosystem is the work of the nonprofit ANA Educational Foundation (AEF), which has the mission of enhancing the understanding of advertising and marketing within the academic and marketing communities. For more information, visit www.ana.net.



About the ARF

Founded more than 80 years ago, the ARF is dedicated to creating, curating, and sharing objective, industry-level advertising research to enable members to make a true impact on their advertising and build marketing leadership within their organizations. It has 400 members from leading brand advertisers, agencies, research firms, and media-tech companies. For more information, please visit www.thearf.org.