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Dear Mr. Sepanik:

This letter is reference to the notice posted on the Census Bureau's Web site at <http://www.census.gov/hhes/www/housing/soma/soma.html>, which states that the Survey of Market Absorption (SOMA) may be discontinued.

As members of the private sector who work to serve the American public by building multifamily housing (including both rental apartments and condominiums), we strongly object to any plan to curtail or eliminate the SOMA.

In order to make informed business decisions about the appropriate amount of housing to build at a given time, the absorption rates produced by SOMA are absolutely vital. When absorption rates are rising, it means demand is generally high relative to supply and the private sector needs to step up production. When absorption rates are falling, it means that it may be time to pull back. The SOMA is the only source for these absorption rates. There is no substitute for this information in either the private sector or elsewhere in the public sector.

Other information produced by the SOMA includes asking rents and, for condos, asking prices. These also are vitally important indicators of market demand that the private sector needs in order to make informed decisions. Again, there is no substitute for this information from any other source, so all of this would be lost were the SOMA to be discontinued.

Frankly, we are seriously concerned that the federal government would single out a multifamily survey for possible cuts. Multifamily housing is an important part of the U.S. housing stock. An adequate supply of rental units is needed to serve newly formed households who have not yet saved enough for a downpayment, households that may need to move in the short run for job-related reasons, and others. Multifamily condominiums play a key role in opening homeownership opportunities to a greater share of American families, especially in high-cost areas. It makes no sense to belittle this important segment of the housing market by eliminating the one federal survey designed to provide information about it. We oppose, in the strongest possible terms, any attempt to eliminate the SOMA.