

Andrea Gyger

From: Sheri Davis <sdavis1@douglas.co.us>
Sent: Wednesday, August 07, 2013 4:15 PM
To: SoS Rulemaking
Cc: Jack Arrowsmith; Micheal Acree
Subject: Comments: Election Rules Recodification

Page 6, Lines 19-30:

Eligible Elector vs Registered Voter? This definition of an eligible elector contradicts the last sentence "A designated watcher need not be a resident of the County he or she is designated in as long as he or she is an eligible elector in the State of Colorado.

Page 8 Line 12:

Requirement to notify voter within "one" business day, seems unreasonable.

Page 9 Line 21:

A suspended driver's license is considered current and valid. A revoked or expired license is not... How would we know if the license was either "suspended or revoked"?

Page 10, Lines 25-32

We would request adding a requirement for the "DEO shall provide copy of ID to Clerk when conducting their own MB election."

Page 15, Lines 15-19

What are examples of "proof" the voter has continuously resided ...? Please add examples.

Page 15, Lines 34-35

What training and when will it be available? Will there be online offerings?

Page 25, Lines 27-30

What happens if candidate doesn't provide audio? We would like to have this same requirement for local candidates.

Page 36, Line 25-26

When will training course be ready, where will Supervisor Judge be required to attend such training? Will there be on-line offerings?

Page 38, Line 28

Recommend considering adding:

Vendor, and no ballot has been returned, the county must void ...

Page 39, Lin 19

Is there a definition of an "Administrative emergency" or does any last minute emergency fall into this category?

Page 54, Line 13

Related to challenges in general, When does the excessive challenger rise to "harassment"? Can all voters who register on election day be challenged?

Page 87, line 19

(C) At the conclusion of tabulation... is this intended to be the last tally of the evening on Election Night? What if it is after midnight? What if we have not finished all ballot counting by the end of the evening and we have more ballots to scan the next day?

Page 137, Line 35:

This is a GREAT change and eliminates the need for generators, UPS boxes. YAY!

Page 141, Line 25:

The term “at the time of voting” is not defined. One interpretation would mean that the judge cannot access the VVPAT records while a voter is actively using the voting device; another interpretation would mean that the judge cannot access the VVPAT records any time the device is deployed for the purposes of voting. The second interpretation does not work for Douglas County since our judges are responsible for changing the paper on VVPAT devices and thereby require access to the VVPAT records. In relation, the first interpretation also does not work because our judges occasionally need to change the paper on a VVPAT device while a voter is actively using the device to vote.

Page 143, Line 4 (remedies to a seal being broken):

The author assumes that the seal is on a piece of electronic voting equipment. Nowhere (that I’ve found) are there remedies for a seal discrepancy on a non-electronic device such as a ballot box. For example, we cannot verify/reinstate the trusted build on a ballot box.

Page 143, Line 20:

My interpretation and assumption is that the county can reinstate the trusted build on their own without the assistance of the SOS and the county can maintain their own trusted build disks and/or be in possession of the SOS copy of the trusted build disks outside the presence of SOS personnel.

Page 148, Line 16 (section 43.18):

The author assumes that the Runbeck BOD solution will always be used, which is not the case in Douglas County

43.18.2(D) assumes that the laptops are used only for BOD, which may not necessarily always be the case

43.18.2(D) does not define “not in use” which may make it onerous and expensive to comply to this requirement

General Comments: These rules continue to use the term “Optical Scanner”, which the Hart system does not use. I would prefer another term such as “Central Count Ballot Scanner” to reduce ambiguity

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