

## Andrea Gyger

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**From:** Kathleen Erie <kathleene@sanmiguelcounty.org>  
**Sent:** Wednesday, August 07, 2013 3:53 PM  
**To:** SoS Rulemaking  
**Subject:** Re-codification of SOS Election Rules

The following are my thoughts, in addition to those provided by the CCCA Election Statute Review Committee:

General comment – this is an opportunity to make the SOS Rules that have “just grown” into something much more logical in presentation of topics. This is not happening with this rendition. Perhaps further restructuring will become more obvious in the next draft. The following comments are organized by the revised Rule section and paragraph.

- 1.1.21 – Currently there are other categories of “Inactive”. Is the intent is to compress into a single one?
- 1.1.31 – Doesn’t seem to cover the digital representation on a DRE ballot.
- 1.1.33 – This definition is not consistent with voting system definitions at 11.1.4 and 45.1.20.
- 2.14.2 – Should the term be “orally”? Both written and spoken words are “verbal”.
- 4.3 – Did I miss the definition of “Coordinated” election?
- 4.8.1 – This section was simpler before and, typically, the CC&R doesn’t “print” the ballots.
- 5.4 – I thought Special Districts were not subject to the VSPC rules if they didn’t coordinate with the CC&R. Should it be clearer when this section is to be used, if at all?
- 7.5.3 – The hourly pick-up would mean that two people were on the road at all times! Not realistic. I understand there is a revision to this section but I have not yet seen it.
- 7.9.2 – What does this mean?
- 7.9.3 – The security procedures for VSPC’s are very vague in these two sections. Should there be a more useful reference?
- 8.12 – How often? This could be very burdensome, especially on Election Day. Will some useful best practices be forthcoming?
- 11.1.1 – “Clerk’s written authorization”?? Not sure what the intent is here. Typically it is only used to set up the election on the, say, Hart equipment. Does this need a special written OK for the Chief Deputy to do her job? Doesn’t 11.1.2 take care of this?
- 11.11.1 – Why is the manner of election night reporting under SOS control? Is it or is it not part of the “Voting System”? Though the SOS office pays for it, we need to update the virus protection on the ENR and BOD thumb drives – not sure if that is a small or large fee annually.
- 40.2 – No clear definition of duties/responsibilities.

43.1.8 – “Dedicated” may be a problem. I haven’t investigated this with the County IT staff. This has not been an issue for us in the past because we did not have SCORE at polling places but will need to at the VSPC’s.

Respectfully,

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