

October 1, 2013

The Honorable Scott Gessler  
Secretary of State  
Department of State  
1700 Broadway  
Denver, CO 80290

**Re: Proposed Rulemaking Relating to Election Rules Recodification**

Dear Secretary Gessler:

New Era Colorado Foundation is a multi-issue organization committed to engaging, educating, and training a new generation of active citizens and young leaders in Colorado.

Thank you for the opportunity to comment on the proposed rule changes. In particular, our organization opposes changes to Rule 17 regarding Voter Registration Drives or VRD's. Currently, existing rule specifies that the Organizer of the VRD must complete an online training quiz and then train circulators before those circulators are able to register voters. In practice, what this looks like is volunteers show up to volunteer, we provide a training and orientation on the spot or in the office during a meeting, the volunteer fills out an acknowledgment form, and then the volunteer is able to register voters with us.

The proposed new rule would require each of these volunteer circulators to take the online training and get a certificate after they complete it. They then would have to present the completed certificate to the VRD organizer before they can register voters with that VRD. This would create a very significant barrier to a volunteer being able to easily volunteer with a VRD. There are several reasons why this, in practice, makes voter registration more difficult for VRDs. For instance, it would significantly impact our ability to do group trainings unless if we have dozens of computers available. If we don't have computers available for all the volunteers at our office then it would require them to have proactively taken this training quiz at their home before coming in to volunteer, etc. This additional bureaucracy could be a significant barrier for your typical volunteer who just wants to do non-partisan voter registration.

Because promoting hands on democracy among young voters is a part of New Era Colorado Foundation's mission, the new Rule 17 would significantly impede our ability to engage in a core area of our work and would dissuade many volunteers from giving their free time to participate in efforts to get more young people involved in voting.

Thank you again for allowing New Era Colorado Foundation the opportunity to comment on this rule-making. If you have any questions regarding our comments please contact us.

Sincerely,

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