

From: Harvie Branscomb Sent: Tuesday, October 08, 2013 4:36 PM  
To: Andrea Gyger; SoS Rulemaking  
Cc: Suzanne Staiert; Public UVS Panel; Hilary Rudy; Dwight Shellman  
Subject: Colorado Elections rules 10\_1\_2013 Rulemaking- Harvie Branscombs' comments on 214 pages- submission

Gentlepeople of the Secretary of State Office of Colorado

Attached is the full document submission for Colorado election rules changes for the 10/1/2013 Rulemaking (214 pages) with my final 377 comments in tracked changes in red (4MB pdf). I also attach a pdf of a spreadsheet containing a list of my comments and prioritization with respect to the 2013 November election, in order to allow focus on the easiest to change and most important comments first.

Of course almost every rule is touched by these changes, so everything in the rules is up for improvement, and yes there is room for improvement.... and much improvement has already been made in these rules drafts.

Many thanks are due to the CDOS staff for opening this discussion early with an original draft, and soliciting early comments. It is well worth noting that at this point in time in Colorado is experiencing historic changes in election methodology and the usual patient process that Colorado citizens deserve to have is impossible due to deadlines enforced by the HB 13-1303 legislation

One significant rule addition I hope for is a well named and easy to reference document to be created by each Designated Election Official and by the SOS that contains all of the instances of "designations", "authorizations", "delegation" (and so on) of authority or responsibility to others by the "DEO" "SOS" etc. There are many instances of the phrase "SOS or designee" or "DEO may designate", etc. and the public deserves- always- to have easy access to the contact information for these designees. I hope to see such a rule added so that we can CORA request the specific document that contains all the designations in each jurisdiction.

Colorado is experiencing a rather drastic shift towards more computerized and centralized elections, with more control and authority given to a smaller number of people around the county clerks. This change merits a substantial increase in opportunity for citizen verification of election process and this must be made through extra transparency of records, easy access to data, and additional roles for citizens to oversee a very complex process. The citizens of Colorado are depending in the CO SOS to defend their access and means of participation in their election through the roles of election judge, watcher and canvass board in all aspects of the citizens' election.

Thank you very much for reviewing my submission in detail. The attached spreadsheet shows a listing of the first portion of each comment, the category I place it in and the page and comment number. In addition there is a column for priority from 1 to 3. The priority items are shown as "1" and these are either most important for the upcoming election or very easy to change and uncontroversial. Priority 2 is important but not immediate. And priority 3 needs to be addressed well before another election cycle begins.

Thanks again for this important opportunity.

Harvie Branscomb