



NARAL Pro-Choice Colorado

December 14, 2011

The Honorable Scott Gessler
Office of the Secretary of State
1700 Broadway, Suite 200
Denver, CO 80246

RE: December 15 Rulemaking Hearing r.e. Revised Draft of Proposed Rules Concerning Campaign and Political Finance 8 CCR 1505-6

Dear Secretary Gessler:

In light of the upcoming rule-making, I am writing to comment on proposed rules 1.7, 1.12, 1.18, 4.1, and 7.2, which could decrease transparency around political activities in Colorado. Historically, Colorado's campaign finance rules have been subject to thorough deliberation and debate through a direct vote of the people or consideration by the General Assembly. The scope of changes proposed here have been subject to neither, and NPCC expresses strong reservations that the proposed rules will contribute to an overall decline in openness, transparency, and accountability during public debate about ballot issues and candidate campaigns.

As a statewide 501(c)(4) membership organization, NPCC develops and sustains a constituency that uses the political process to guarantee every woman the right to make personal decisions regarding the full range of reproductive health choices, including preventing unintended pregnancies, bearing healthy children and choosing legal abortion. As such, the organization works to raise awareness about both (a) changes in law that could fundamentally alter Coloradans' ability to access the full spectrum of reproductive health care services necessary throughout their lifetimes, and (b) policymakers and others who propose changes in these laws.

The contribution-reporting thresholds for issue committees; budgetary assessments for determination of what constitutes issue committees and political organizations in the State of Colorado; and criteria to be deemed a "political organization" based on a combination of types of communications, budget, purpose, and tax status; set forth in the proposed rules would undermine Colorado voters' ability to learn who supports or opposes changes in laws that affect Coloradans' everyday lives. Coloradans would have no way of determining who is attempting to persuade them to support or oppose candidates or ballot issues if individuals and entities did not meet the arbitrary thresholds laid out in these proposed rules.

NPCC believes the proposed rules fundamentally weaken the intent of campaign-finance disclosure laws Coloradans not only voted to establish, but have come to expect during election cycles. For these reasons, NPCC respectfully requests that you not adopt proposed rules 1.7; 1.12; 4.1; 7.2; and 1.18.

Sincerely,

Toni Panetta
Political Director
NARAL Pro-Choice Colorado Inc.