

Andrea Gyger

From: Mary Eberle [REDACTED]
Sent: Tuesday, May 12, 2015 12:16 PM
To: Wayne Williams; SoS Rulemaking
Cc: Suzanne Staiert; Andrea Gyger; Dwight Shellman; Vanessa Conway; Judd Choate; Dana Williams
Subject: Comment for Rule Making on Rule 16.2.1(c)
Attachments: 2014_mailing_dates_from FVAP website.pdf

Dear Secretary of State Williams,

RE: Rule 16.2.1(c)

It is the responsibility of your office and of the county clerks to educate the UOCAVA voters and election judges that, for the security of the entire election, it is the voter's responsibility to return the ballot by postal or expedited mail if at all possible. That responsibility was assumed by the Secretary of State's Office in 2006, when SBO6-062 passed.

Hacking has become too prevalent to allow the casual return of ballots over the Internet (including via email and computer-based fax) unless the voter faces very unusual circumstances with no other options.

The voter should be instructed in multiple communications to print the ballot onto paper immediately (if it is electronically transmitted) and to check for proper precinct and style and content.

Regardless of how the unvoted ballot is transmitted, the voter should immediately hand mark the paper ballot and then immediately use postal or expedited mail to send the paper copy back along with the filled-out and signed affidavit.

The Affidavit and Cover Sheet document should have clear instructions to print the blank ballot immediately, mark it, mark and sign the affidavit, and preferably use postal or expedited mail to return the ballot and affidavit to the clerk. In addition to the information already collected on the affidavit, it should have check boxes that say,

- "I am returning my ballot and this filled-out and signed affidavit by postal or expedited mail."

or

- "I did not receive my ballot until it was too late to return it by postal mail, so I have scanned it with my hand-marked votes and am returning it and this filled-out and signed affidavit electronically."

The instructions on the back of the Affidavit and Cover Sheet should list the return methods in order of preference for maintaining election security:

Methods to return your ballot, in order of preference for maintaining election security:

1. Return by postal or expedited mail. Consult the SOS's website to see the time frame for ballot return by eight days after the election from various countries. [Place a link to the FVAP time frame on the SOS website and give the link here. The file for the 2014 election is attached for your reference. There is likely a similar list for civilians that you could also post and link to.]
2. Return by telephone-based facsimile (fax).
3. Return by email attachment or computer-based fax.

This order is reversed on the 3/18/15 version of the Affidavit and Cover Sheet, and the reversal gives the user the wrong impression of the preference.

I prefer that you not try to define "feasible" because you are making it too easy for voters to dawdle and then send their ballot back electronically. Further, the word "believe" in your proposed definition relieves the voter of checking and adhering to the FVAP time frame that I suggest you make easy to check. If you must define "feasible," however, please use the following wording (including punctuation), which is similar to Senator Lundberg's proposed definition:

“Not feasible” means circumstances where voting in person or by regular or expedited mail is impossible because a covered military voter is out of the state, or a covered overseas voter is out of the country, and regular or expedited postal mail is unavailable to the covered voter for paper ballot return in time for the ballot to reach the clerk by the close of business on the eighth day after an election.

Thank you for the opportunity to comment on this proposed draft rule.

Mary C. Eberle

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**2014 ELECTION SEASON
RECOMMENDED ABSENTEE BALLOT MAILING DATES
BY APO / FPO**

APO/ FPO	AA/ AE/ AP	ZIP	GEO LOCATION	MAILING DAYS (From Election Date)	RECOMMENDED MAILING DATE (From Election Date)
APO	AE	09002	GERMANY	8	27-Oct-2014
APO	AE	09009	GERMANY	8	27-Oct-2014
APO	AE	09011	GERMANY	8	27-Oct-2014
APO	AE	09012	GERMANY	8	27-Oct-2014
APO	AE	09020	GERMANY	8	27-Oct-2014
APO	AE	09021	GERMANY	8	27-Oct-2014
APO	AE	09033	GERMANY	8	27-Oct-2014
APO	AE	09034	GERMANY	8	27-Oct-2014
APO	AE	09038	GERMANY	8	27-Oct-2014
APO	AE	09046	GERMANY	8	27-Oct-2014
APO	AE	09049	GERMANY	8	27-Oct-2014
APO	AE	09053	GERMANY	8	27-Oct-2014
APO	AE	09055	GERMANY	8	27-Oct-2014
APO	AE	09059	GERMANY	8	27-Oct-2014
APO	AE	09060	GERMANY	8	27-Oct-2014
APO	AE	09067	GERMANY	8	27-Oct-2014
APO	AE	09069	GERMANY	10	25-Oct-2014
APO	AE	09075	GERMANY	8	27-Oct-2014
APO	AE	09079	GERMANY	8	27-Oct-2014
APO	AE	09094	GERMANY	8	27-Oct-2014
APO	AE	09095	GERMANY	8	27-Oct-2014
APO	AE	09096	GERMANY	8	27-Oct-2014
APO	AE	09103	GERMANY	7	28-Oct-2014
APO	AE	09104	GERMANY	8	27-Oct-2014
APO	AE	09107	GERMANY	8	27-Oct-2014
APO	AE	09112	GERMANY	8	27-Oct-2014
APO	AE	09114	GERMANY	8	27-Oct-2014
APO	AE	09123	GERMANY	8	27-Oct-2014
APO	AE	09126	GERMANY	8	27-Oct-2014
APO	AE	09128	GERMANY	8	27-Oct-2014
APO	AE	09138	GERMANY	8	27-Oct-2014
APO	AE	09139	GERMANY	8	27-Oct-2014
APO	AE	09140	GERMANY	8	27-Oct-2014
APO	AE	09142	GERMANY	7	28-Oct-2014
APO	AE	09143	GERMANY	8	27-Oct-2014
APO	AE	09154	GERMANY	8	27-Oct-2014
APO	AE	09172	GERMANY	7	28-Oct-2014
APO	AE	09173	GERMANY	8	27-Oct-2014
APO	AE	09177	GERMANY	8	27-Oct-2014
APO	AE	09180	GERMANY	8	27-Oct-2014
APO	AE	09213	GERMANY	8	27-Oct-2014
APO	AE	09214	GERMANY	8	27-Oct-2014
APO	AE	09226	GERMANY	8	27-Oct-2014
APO	AE	09227	GERMANY	8	27-Oct-2014

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RECOMMENDED ABSENTEE BALLOT MAILING DATES
BY APO / FPO**

APO/ FPO	AA/ AE/ AP	ZIP	GEO LOCATION	MAILING DAYS (From Election Date)	RECOMMENDED MAILING DATE (From Election Date)
APO	AE	09245	GERMANY	8	27-Oct-2014
APO	AE	09250	GERMANY	8	27-Oct-2014
APO	AE	09261	GERMANY	11	24-Oct-2014
APO	AE	09263	GERMANY	8	27-Oct-2014
APO	AE	09264	GERMANY	8	27-Oct-2014
APO	AE	09265	GERMANY	8	27-Oct-2014
APO	AE	09302	GEORGIA	10	25-Oct-2014
APO	AE	09306	KUWAIT	15	20-Oct-2014
APO	AE	09307	BAHRAIN	7	28-Oct-2014
APO	AE	09309	QATAR	10	25-Oct-2014
APO	AE	09310	AFGHANISTAN	20	15-Oct-2014
APO	AE	09313	AFGHANISTAN	20	15-Oct-2014
APO	AE	09320	AFGHANISTAN	20	15-Oct-2014
APO	AE	09321	JORDAN	17	18-Oct-2014
APO	AE	09328	OMAN	17	18-Oct-2014
APO	AE	09330	KUWAIT	15	20-Oct-2014
APO	AE	09337	KUWAIT	15	20-Oct-2014
APO	AE	09339	TURKMENISTAN	17	18-Oct-2014
APO	AE	09340	KOSOVO	14	21-Oct-2014
APO	AE	09343	ISRAEL	14	21-Oct-2014
APO	AE	09347	AFGHANISTAN	20	15-Oct-2014
APO	AE	09352	AFGHANISTAN	20	15-Oct-2014
APO	AE	09353	KYRGYZSTAN	20	15-Oct-2014
APO	AE	09354	AFGHANISTAN	20	15-Oct-2014
APO	AE	09355	AFGHANISTAN	20	15-Oct-2014
APO	AE	09356	AFGHANISTAN	20	15-Oct-2014
APO	AE	09360	CUBA	14	21-Oct-2014
FPO	AE	09363	DJIBOUTI	10	25-Oct-2014
APO	AE	09364	AFGHANISTAN	20	15-Oct-2014
APO	AE	09365	QATAR	15	20-Oct-2014
APO	AE	09366	KUWAIT	15	20-Oct-2014
APO	AE	09368	AFGHANISTAN	20	15-Oct-2014
FPO	AE	09369	AFGHANISTAN	20	15-Oct-2014
APO	AE	09370	AFGHANISTAN	20	15-Oct-2014
FPO	AE	09372	AFGHANISTAN	20	15-Oct-2014
FPO	AE	09373	AFGHANISTAN	20	15-Oct-2014
FPO	AE	09379	BAHRAIN	15	20-Oct-2014
APO	AE	09380	AFGHANISTAN	20	15-Oct-2014
APO	AE	09382	AFGHANISTAN	20	15-Oct-2014
APO	AE	09383	AFGHANISTAN	20	15-Oct-2014
APO	AE	09397	ETHIOPIA	30	5-Oct-2014
APO	AE	09403	ENGLAND	11	24-Oct-2014
APO	AE	09421	ENGLAND	8	27-Oct-2014
APO	AE	09447	ENGLAND	7	28-Oct-2014

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APO/ FPO	AA/ AE/ AP	ZIP	GEO LOCATION	MAILING DAYS (From Election Date)	RECOMMENDED MAILING DATE (From Election Date)
APO	AE	09454	ENGLAND	11	24-Oct-2014
APO	AE	09459	ENGLAND	8	27-Oct-2014
APO	AE	09463	ENGLAND	8	27-Oct-2014
APO	AE	09464	ENGLAND	8	27-Oct-2014
APO	AE	09468	ENGLAND	8	27-Oct-2014
APO	AE	09469	ENGLAND	8	27-Oct-2014
APO	AE	09470	ENGLAND	8	27-Oct-2014
APO	AE	09494	ENGLAND	8	27-Oct-2014
FPO	AE	09501	ENGLAND	7	28-Oct-2014
APO	AE	09522	CUBA	14	21-Oct-2014
FPO	AE	09589	CUBA	14	21-Oct-2014
FPO	AE	09593	CUBA	14	21-Oct-2014
APO	AE	09602	ITALY	8	27-Oct-2014
APO	AE	09603	ITALY	10	25-Oct-2014
APO	AE	09606	ITALY	10	25-Oct-2014
FPO	AE	09608	ITALY	7	28-Oct-2014
FPO	AE	09609	ITALY	7	28-Oct-2014
APO	AE	09610	ITALY	11	24-Oct-2014
APO	AE	09613	ITALY	10	25-Oct-2014
FPO	AE	09617	ITALY	7	28-Oct-2014
FPO	AE	09618	ITALY	7	28-Oct-2014
FPO	AE	09620	ITALY	7	28-Oct-2014
FPO	AE	09621	ITALY	7	28-Oct-2014
FPO	AE	09622	ITALY	7	28-Oct-2014
FPO	AE	09623	ITALY	7	28-Oct-2014
FPO	AE	09624	ITALY	7	28-Oct-2014
FPO	AE	09625	ITALY	7	28-Oct-2014
FPO	AE	09626	ITALY	7	28-Oct-2014
FPO	AE	09627	ITALY	7	28-Oct-2014
APO	AE	09630	ITALY	10	25-Oct-2014
FPO	AE	09631	ITALY	7	28-Oct-2014
APO	AE	09633	ITALY	7	28-Oct-2014
FPO	AE	09636	ITALY	7	28-Oct-2014
APO	AE	09642	SPAIN	8	27-Oct-2014
APO	AE	09643	SPAIN	8	27-Oct-2014
FPO	AE	09645	SPAIN	7	28-Oct-2014
APO	AE	09647	SPAIN	8	27-Oct-2014
DPO	AE	09701	AUSTRIA	8	27-Oct-2014
APO	AE	09702	BELGIUM	8	27-Oct-2014
APO	AE	09703	NETHERLANDS	8	27-Oct-2014
APO	AE	09704	GREENLAND	14	21-Oct-2014
APO	AE	09705	BELGIUM	8	27-Oct-2014
APO	AE	09706	NORWAY	11	24-Oct-2014
APO	AE	09707	NORWAY	8	27-Oct-2014

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APO/ FPO	AA/ AE/ AP	ZIP	GEO LOCATION	MAILING DAYS (From Election Date)	RECOMMENDED MAILING DATE (From Election Date)
APO	AE	09708	BELGIUM	7	28-Oct-2014
APO	AE	09711	NETHERLANDS	8	27-Oct-2014
APO	AE	09713	BELGIUM	7	28-Oct-2014
APO	AE	09714	BELGIUM	8	27-Oct-2014
APO	AE	09715	NETHERLANDS	8	27-Oct-2014
APO	AE	09716	DENMARK	8	27-Oct-2014
APO	AE	09717	NETHERLANDS	11	24-Oct-2014
APO	AE	09718	MOROCCO	11	24-Oct-2014
APO	AE	09719	BELGIUM	11	24-Oct-2014
APO	AE	09720	AZORES	13	22-Oct-2014
APO	AE	09722	POLAND	14	21-Oct-2014
APO	AE	09723	FINLAND	8	27-Oct-2014
APO	AE	09724	BELGIUM	8	27-Oct-2014
APO	AE	09725	POLAND	4	31-Oct-2014
FPO	AE	09729	PORTUGAL	7	28-Oct-2014
APO	AE	09732	CANADA	7	28-Oct-2014
FPO	AE	09733	CANADA	7	28-Oct-2014
APO	AE	09735	CANADA	7	28-Oct-2014
APO	AE	09743	POLAND	14	21-Oct-2014
APO	AE	09745	HUNGARY	12	23-Oct-2014
FPO	AE	09747	IBERIAN PENINSULA	7	28-Oct-2014
APO	AE	09749	ROMANIA	14	21-Oct-2014
APO	AE	09751	GERMANY	8	27-Oct-2014
APO	AE	09752	NETHERLANDS	7	28-Oct-2014
APO	AE	09753	BULGARIA	7	28-Oct-2014
APO	AE	09777	FRANCE	8	27-Oct-2014
APO	AE	09780	BOSNIA-HERZEGOVINA	10	25-Oct-2014
APO	AE	09798	FRANCE	8	27-Oct-2014
APO	AE	09801	UNITED ARAB EMIRATES	10	25-Oct-2014
APO	AE	09802	TURKEY	12	23-Oct-2014
APO	AE	09803	SAUDI ARABIA	10	25-Oct-2014
APO	AE	09804	TURKEY	8	27-Oct-2014
FPO	AE	09805	BAHRAIN	15	20-Oct-2014
APO	AE	09807	KYRGYZSTAN	15	20-Oct-2014
APO	AE	09810	TURKEY	7	28-Oct-2014
APO	AE	09811	SAUDI ARABIA	15	20-Oct-2014
APO	AE	09818	CYPRUS	8	27-Oct-2014
APO	AE	09821	TURKEY	8	27-Oct-2014
APO	AE	09822	TURKEY	11	24-Oct-2014
APO	AE	09824	TURKEY	8	27-Oct-2014
APO	AE	09829	ISRAEL	7	28-Oct-2014
APO	AE	09830	ISRAEL	8	27-Oct-2014
APO	AE	09832	EGYPT	20	15-Oct-2014
APO	AE	09833	EGYPT	20	15-Oct-2014

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APO/ FPO	AA/ AE/ AP	ZIP	GEO LOCATION	MAILING DAYS (From Election Date)	RECOMMENDED MAILING DATE (From Election Date)
FPO	AE	09834	BAHRAIN	15	20-Oct-2014
FPO	AE	09835	EGYPT	20	15-Oct-2014
APO	AE	09836	ENGLAND	8	27-Oct-2014
FPO	AE	09837	UNITED ARAB EMIRATES	15	20-Oct-2014
FPO	AE	09838	BAHRAIN	15	20-Oct-2014
APO	AE	09839	EGYPT	17	18-Oct-2014
FPO	AE	09840	BAHRAIN	15	20-Oct-2014
FPO	AE	09841	GREECE	7	28-Oct-2014
FPO	AE	09842	GREECE	7	28-Oct-2014
FPO	AE	09844	GREECE	7	28-Oct-2014
APO	AE	09848	TURKEY	12	23-Oct-2014
APO	AE	09852	SAUDI ARABIA	15	20-Oct-2014
APO	AE	09853	UNITED ARAB EMIRATES	15	20-Oct-2014
APO	AE	09855	KUWAIT	15	20-Oct-2014
APO	AE	09858	SAUDI ARABIA	15	20-Oct-2014
FPO	AE	09859	BAHRAIN	15	20-Oct-2014
FPO	AE	09865	CRETE	7	28-Oct-2014
APO	AE	09868	EGYPT	20	15-Oct-2014
APO	AE	09880	KUWAIT	15	20-Oct-2014
APO	AE	09890	OMAN	10	25-Oct-2014
APO	AE	09898	QATAR	15	20-Oct-2014
FPO	AA	34007	EL SALVADOR	7	28-Oct-2014
APO	AA	34038	COLOMBIA	7	28-Oct-2014
APO	AA	34042	HONDURAS	7	28-Oct-2014
FPO	AA	34058	BAHAMAS	7	28-Oct-2014
APO	AP	96201	KOREA	7	28-Oct-2014
APO	AP	96202	KOREA	7	28-Oct-2014
APO	AP	96203	KOREA	7	28-Oct-2014
APO	AP	96204	KOREA	7	28-Oct-2014
APO	AP	96205	KOREA	7	28-Oct-2014
APO	AP	96206	KOREA	7	28-Oct-2014
APO	AP	96207	KOREA	7	28-Oct-2014
APO	AP	96213	KOREA	7	28-Oct-2014
APO	AP	96214	KOREA	7	28-Oct-2014
APO	AP	96218	KOREA	7	28-Oct-2014
APO	AP	96224	KOREA	7	28-Oct-2014
APO	AP	96257	KOREA	7	28-Oct-2014
APO	AP	96258	KOREA	7	28-Oct-2014
APO	AP	96260	KOREA	7	28-Oct-2014
APO	AP	96264	KOREA	7	28-Oct-2014
APO	AP	96266	KOREA	7	28-Oct-2014
APO	AP	96267	KOREA	7	28-Oct-2014
FPO	AP	96269	KOREA	7	28-Oct-2014
APO	AP	96271	KOREA	7	28-Oct-2014

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APO	AP	96275	KOREA	7	28-Oct-2014
APO	AP	96276	KOREA	7	28-Oct-2014
APO	AP	96278	KOREA	7	28-Oct-2014
APO	AP	96283	KOREA	7	28-Oct-2014
FPO	AP	96306	JAPAN	7	28-Oct-2014
APO	AP	96309	JAPAN	7	28-Oct-2014
FPO	AP	96310	JAPAN	7	28-Oct-2014
APO	AP	96319	JAPAN	7	28-Oct-2014
FPO	AP	96321	JAPAN	7	28-Oct-2014
FPO	AP	96322	JAPAN	7	28-Oct-2014
APO	AP	96323	JAPAN	7	28-Oct-2014
APO	AP	96326	JAPAN	7	28-Oct-2014
APO	AP	96328	JAPAN	7	28-Oct-2014
APO	AP	96330	JAPAN	7	28-Oct-2014
APO	AP	96336	JAPAN	7	28-Oct-2014
APO	AP	96337	JAPAN	7	28-Oct-2014
APO	AP	96338	JAPAN	7	28-Oct-2014
APO	AP	96339	JAPAN	7	28-Oct-2014
APO	AP	96343	JAPAN	7	28-Oct-2014
FPO	AP	96346	JAPAN	7	28-Oct-2014
FPO	AP	96347	JAPAN	7	28-Oct-2014
FPO	AP	96348	JAPAN	7	28-Oct-2014
FPO	AP	96349	JAPAN	7	28-Oct-2014
FPO	AP	96350	JAPAN	7	28-Oct-2014
FPO	AP	96351	JAPAN	7	28-Oct-2014
FPO	AP	96362	JAPAN	7	28-Oct-2014
APO	AP	96365	JAPAN	7	28-Oct-2014
APO	AP	96367	JAPAN	7	28-Oct-2014
APO	AP	96368	JAPAN	7	28-Oct-2014
FPO	AP	96370	JAPAN	7	28-Oct-2014
FPO	AP	96372	JAPAN	7	28-Oct-2014
FPO	AP	96373	JAPAN	7	28-Oct-2014
FPO	AP	96374	JAPAN	7	28-Oct-2014
FPO	AP	96375	JAPAN	7	28-Oct-2014
FPO	AP	96376	JAPAN	7	28-Oct-2014
FPO	AP	96377	JAPAN	7	28-Oct-2014
FPO	AP	96378	JAPAN	7	28-Oct-2014
FPO	AP	96379	JAPAN	7	28-Oct-2014
FPO	AP	96380	JAPAN	7	28-Oct-2014
FPO	AP	96384	JAPAN	7	28-Oct-2014
FPO	AP	96386	JAPAN	7	28-Oct-2014
FPO	AP	96387	JAPAN	7	28-Oct-2014
FPO	AP	96388	JAPAN	7	28-Oct-2014
FPO	AP	96389	JAPAN	7	28-Oct-2014

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APO	AP	96400	THAILAND	7	28-Oct-2014
APO	AP	96401	PHILLIPINES	7	28-Oct-2014
FPO	AP	96427	AFGHANISTAN	20	15-Oct-2014
APO	AP	96447	THAILAND	7	28-Oct-2014
FPO	AP	96502	INDONESIA	7	28-Oct-2014
APO	AP	96503	THAILAND	7	28-Oct-2014
FPO	AP	96510	CANADA	7	28-Oct-2014
FPO	AP	96511	BRITISH COLUMBIA	7	28-Oct-2014
FPO	AP	96515	PHILLIPINES	7	28-Oct-2014
FPO	AP	96522	CHINA	7	28-Oct-2014
APO	AP	96531	NEW ZEALAND	7	28-Oct-2014
FPO	AP	96534	SINGAPORE	7	28-Oct-2014
APO	AP	96544	THAILAND	7	28-Oct-2014
APO	AP	96546	THAILAND	7	28-Oct-2014
APO	AP	96547	THAILAND	7	28-Oct-2014
APO	AP	96548	AUSTRALIA	7	28-Oct-2014
FPO	AP	96550	AUSTRALIA	7	28-Oct-2014
APO	AP	96553	AUSTRALIA	7	28-Oct-2014
APO	AP	96554	AUSTRALIA	7	28-Oct-2014
APO	AP	96555	MARSHALL ISLAND	12	23-Oct-2014
APO	AP	96557	MARSHALL ISLAND	12	23-Oct-2014
APO	AP	96577	AUSTRALIA	7	28-Oct-2014
FPO	AP	96595	DIEGO GARCIA ISLAND	14	21-Oct-2014
APO	AP	96598	SOUTH POLE	7	28-Oct-2014
APO	AP	96599	ANTARCTICA	7	28-Oct-2014
NAVY SHIPS (DEPLOYED) FLEET POST OFFICES (FPO)			ATLANTIC / PACIFIC FLEETS	25	10-Oct-2014