

Andrea Gyger

From: David C. Burns [REDACTED]
Sent: Friday, May 15, 2015 2:40 PM
To: SoS Rulemaking
Subject: Comments to help shape Colorado's Election Rules

I just read about some proposed amendments to Colorado election rules.

The Amendments to Rule 16.2.1(c) should be **rejected**. Voters do not have all the information they need to determine that returning a ballot online is dangerously insecure, and leaving it up to their opinion can result in greater risk of coercion.

Voters can receive their blank ballots online 45 days before Election Day and have them counted if they arrive by 8 days after Election Day, as long as they were postmarked timely. They may also use "expedited" return service through the Military Postal Service, which on average gets ballots back to the county in 5.2 days.

The Amendments to Rule 20.5.2(f) should be **rejected** also. Inclusion of wi-fi or other wireless capacity in a voting system does not meet with security best practices, and fails to measure up to federal guidelines against which voting systems are tested nationally.

Recent news accounts about hacking of public WiFi spots such as Starbucks is just the latest example of how insecure these methods can be.

Recently a voting system in Virginia was de-certified when it was shown that its wi-fi capability would easily enable undetectable tampering with vote results! Although Colorado doesn't require testing to those federal guidelines, the existing state security Rules at least require disabling of any wireless capacity. This Amendment would make that safeguard *optional*, without having to show that such an exception would not endanger the integrity of the election.

These are unacceptable risks to the integrity of elections and should be rejected in their entirety.

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David Coulon Burns
Louisville, CO

As a species, we demonstrate a remarkably level learning curve.