

Andrea Gyger

Subject: FW: Proposed Rule Changes

From: Susan Rudy [REDACTED]
Sent: Tuesday, April 05, 2011 3:08 PM
To: Andrea Gyger
Subject: RE: Proposed Rule Changes

Good Afternoon to you Andrea—

Thank you for acknowledging receipt of my comments and question. I would just as soon you redacted the contact information off my comments if you would be so kind.

My second item was more of a question than a comment on the proposed rule. As I recall, there is only one other way to pay the registration fee and that is some sort of prepaid account. How does that work? Can anyone do that as a way to pay the required fee?

From: Susan Rudy [REDACTED]
Sent: Tuesday, April 05, 2011 11:08 AM
To: Angela Lawson
Subject: Proposed Rule Changes

Good Morning Angela,

I have some concerns/questions regarding the proposed changes to the lobbyist rules scheduled for hearing on May 2, 2011

1. Page 2 C.IV regarding situations not considered a bona fide personal emergency—lack of access to the internet or personal computer.

From an agent's point of view, if my ISP goes down just as I am attempting to file a lobbyist's disclosure report, I am in a real pickle the way this rule change is written. Generally I try to get the disclosures filed with lots of time to spare just in case something like this would happen. However, things can and do go awry. This new rule would force me to pick up my files and drive up and down the streets of Greenwood Plaza to find a place where I could enter the reports. Similarly, if my office network goes down, my computer is probably worthless. Neither of these situations is under my control or my lobbyists' control. Expecting a lobbyist to run over to the your offices to file the report while the legislature is in session is not reasonable. At least when filing the forms via fax was available there was a backup plan to assure compliance with deadlines. I would suggest that unplanned loss of internet access and/or computer be considered practical emergencies. This is totally different than not bothering to make arrangements to file electronically.

2. Page 2 C.V. regarding lack of credit card for paying for registrations.

What other payment options are available if one is trying to renew a registration online? Can the Secretary of State really require all registered lobbyists to have a credit card?

Appreciate your assistance as always!

Susan Rudy
Coordinator of Advocacy Services
Colorado Hospital Association
7335 East Orchard Road
Greenwood Village, CO 80111

[REDACTED]
[REDACTED]
www.cha.com

