

## Andrea Gyger

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**From:** McReynolds, Amber Faye - Elections Division <Amber.McReynolds@denvergov.org>  
**Sent:** Tuesday, October 08, 2013 10:16 AM  
**To:** SoS Rulemaking  
**Cc:** Hilary Rudy; Johnson, Debra A. - OCR Clerk and Recorder  
**Subject:** Denver County Rule Comments  
**Attachments:** Graphic\_Rule Comments NCOA\_2013-10-7.pdf

Dear Secretary Gessler,

Re: Notice of Revised Draft Proposed Election Rules for consideration - 9/26/2013

In accordance with the above-referenced proposed rules, I respectfully submit the following written comments with regards to proposed rule 2.13.2.

C.R.S. 1-2-302.5(3) expressly states that the county 'shall not change an elector's record during the sixty days immediately preceding a primary or general election unless the county clerk and recorder receives confirmation of the new address from the elector.' The proposed rule extends this blackout period to all elections even though the statute only references primary and general elections in accordance with NVRA.

First, we believe this proposed rule creates a circular situation that will inhibit voters from receiving their ballots. In addition, there is a fiscal impact to the taxpayer. Please see the attached document that illustrates the cost comparison of the proposed rule in contrast to our proposed modification. We propose that counties be allowed to process NCOA records up until 8 days before the election to be consistent with the OLVR timeline.

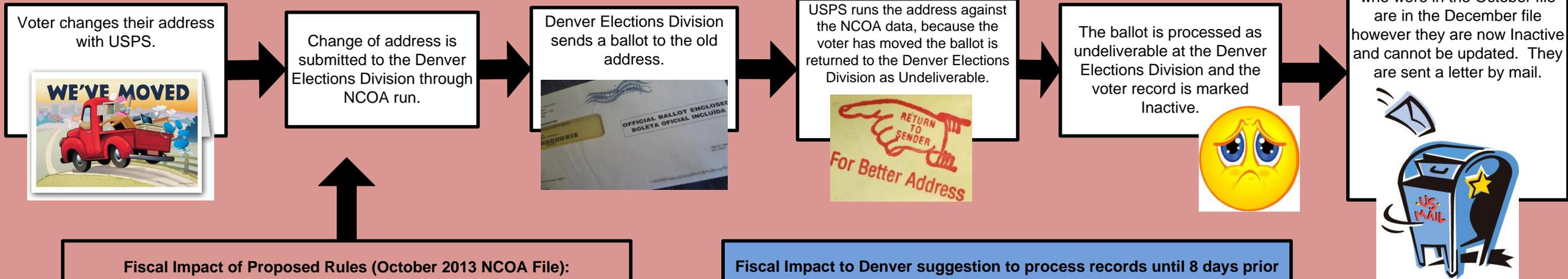
If you have any questions regarding our comments or proposed modification to the rule, please feel free to contact me.

Respectfully submitted,



**Amber F. McReynolds** | Director of Elections | Denver Elections Division  
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# Process and Cost Comparison: SOS Proposed NCOA Rules



**Fiscal Impact of Proposed Rules (October 2013 NCOA File):**  
 In-County and Out of State Moves: 6,161

Cost to mail ballots: \$6,161  
 Cost to receive ballots as undeliverable: \$3,326  
 Cost to process undeliverable ballots: \$400  
 Cost to mail letter: \$3,881  
**Total cost = \$13,768**

**Fiscal Impact to Denver suggestion to process records until 8 days prior to Election Day (October 2013 NCOA File):**  
 In-County and Out of State Moves: 5,176

Cost to mail ballots: \$5,176  
 Cost to mail confirmation card to Out of State voters: \$620  
**Total cost = \$5,796**

