



July 10, 2015

The Honorable Wayne Williams  
Secretary of State  
Department of State  
1700 Broadway  
Denver, Colorado 80290

**Re: Rules Concerning Elections, 8 CCR 1505-1**

Dear Secretary Williams:

Common Cause is a nonpartisan, nonprofit organization that is dedicated to restoring the core values of American democracy, reinventing an open, honest and accountable government that serves the public interest, and empowering ordinary people to make their voices heard in the political process.

The following comments are in response to the Revised Draft of Proposed Rules dated July 1, 2015.

Rules 2.13.1(b), 6.4.1, 6.5: We oppose striking the background check requirement from the rules for those who are processing voter registrations at Voter Service and Polling Centers (2.13.1(b)), serving as supervisor judges (6.4.1), or processing voter registrations/ conducting other list maintenance activities (6.5). From the Secretary of State's response to comments on draft rules dated 7/6/15, we understand that a background check is currently required as part of the current SCORE User Agreement, but given the importance of protecting the personal information of voters, believe that it is more appropriate to maintain this requirement as part of the rules.

Rule 7.11.2(b): We support the adoption of this rule. If access to SCORE is available, it is preferable to issue a regular ballot rather than a provisional ballot. Voters should be given the option to be issued a regular mail ballot.

Rule 7.2.6: We oppose the adoption of this rule. There is no basis in statute for an elector to provide the name and address of the person who returns the ballot on his or her behalf. Adding an additional form to the ballot envelope could result in voter confusion. There is no obligation for a voter who chooses to allow a third party to return his or her ballot to provide this information, but adding this information to the ballot envelope may imply that information is required.

Rule 7.7.1: We oppose the adoption of this rule. The current practice of requiring electors to submit a signed affidavit that undergoes signature verification is appropriate and preferable to enacting a new requirement that electors to submit a copy of their identification. There is no need for an elector to provide a copy of his or her identification in addition to the affidavit; adding this requirement will make it more difficult for an elector to cure a missing signature.

Rule 16 and Rule 20.9.1(c): Please see the comments submitted jointly by Colorado Common Cause and Verified Voting for our concerns with the changes proposed to these rules.

Rule 23.1: We support the creation of a commission to provide input to the Secretary of State from a broad set of stakeholders on an ongoing basis.

Thank you for the opportunity to comment.

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