

From: Kyle Rulli
To: [SoS Rulemaking](#)
Subject: Opposition to 7.5.10
Date: Monday, July 17, 2017 12:47:56 PM

Douglas County is in strong opposition to the changes to Rule 7.5.10, and in agreeance with others who have submitted comments. We depend on the original version of this rule to our internal operation, and the proposed version would hinder our ability to conduct the extremely accurate operations that we do year in and year out.

Currently, the rule allows us to keep the association between SCORE batch numbers and batch IDs through Canvass. Now, the rule is being changed that it must be disassociated before tabulation. This needs to be kept to the original version to allow for operational continuance for all counties who utilize a system of tracking for their batches of ballots which can be cumbersome to track. For instance, in the 2016 General, Douglas County had just shy of 2,000 batches – of which the ballots and envelopes were spread out over 200 boxes.

This change implicates our ability to audit batches of ballots/envelopes. In support of Larimer, ESRC, El Paso, and Denver comments; this disassociation will be detrimental to all activities related to tracking the batches of ballots where we need to pull batches for any reason which would include recount, Post-Election Audit, various counting audits, canvass, etc. Balancing situations arrive, and having this association allows us to correct these issues.

We are not against voter protection, and happily make that disassociation currently after certification as we understand the need to preserve this secrecy. We take operational measures to ensure that the ballot and envelope are not able to be matched up post-removal. I urge the Secretary not to hinder our operations of tracking batches throughout the mail ballot processing and trust in the processes set forth by the Clerks and their counties.

Thank you,

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