Good Day,

I am writing today to include a summary of thoughts, concerns, and support for the various rule updates proposed for the 8/3/2021 hearing as provided by the staff in our office.
Ultimately we have serious concerns and would not be able to comply with some rules due to software limitations in how items may be reviewed. We are in support of other changes as they simplify planning for the conduct of elections.

Thank you for your consideration of the items in the attached document,

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- Rule 2.15.7
    - Does this replace DA notification requirements?
    - What would be the information that needs to be provided to the SOS?

- Rule 7.2.4(a)(2)(B)
    - Not really sure how we implement this – who is to say that the voter doesn't already return the original ballot before the replacement arrives causing confusion – we'd still use 1st ballot back.
    - Will the SOS have a standard letter and a SCORE interface that allows for printing these?
        - If there isn't an interface of some sort to auto-generate mail it will take a lot of staff power to research replacement reasons, compile, track, and make these letters. Using a print vendor would not be possible due to the requirement of specialized letters detailing each reason for replacement.

- Rule 7.7.8
    - Because the AGILIS system by Runbeck only tags a voter's ballot in the system with the last person to touch it electronically, we cannot track these stats automatically. The Runbeck team would have to put development into their system to make this a reality.
- Cannot be done using Agilis Master Export as it only shows the last person to modify the database record, not currently available within the UI: We do not have the capability at this time.

- Rule 7.7.9
    - The Agilis system provides a running total for the day, not by batch so we are not able to review in groups of exactly 150 ballots.
    - During processing, judges will move through thousands of records at a time. We will be required to hire additional judges / staff to keep up with the audit process.
    - Is the unexplained, irregular acceptance, rejection, or overturn rate something that is determined by the county?
    - What is the purpose for notifying the SOS?

- Rule 7.7.10
    - What is the purpose for this providing of data to the SOS
        - What happens to the information?
        - It's going to likely require a significant staff time to compile, build and format to send to the SOS

- 7.7.13(a)(2)(B) – What is the SLA going to be for support? Not sure 1 failed signature should shut down the system as Counties would normally increase threshold and re-calibrate as needed until a perfect audit was completed?

- Rule 7.7.13 (b) (1)
    - Is there a reasoning to increasing the random sampling from 2% to 10%?

- This will require hiring additional staff and purchasing equipment to facilitate the extra audits.

- Rule 7.7.13 (b) (5)
  - What is the purpose for this providing of data to the SOS
    - At that date point
    - As a general statement, what happens to the information
    - It's going to likely require a significant staff time to compile, build and format to send to the SOS
    - The record is already a part of election archives for each county so having them filed both here and at the SOS seems like double the amount
      - Not a major concern but then who owns a CORA request to those
        - Will the SOS (who will have them by rule) refer them to the county since that is who created and maintains the original of the record?

- Rule 8.14.6
  - Why is the word audio included; does that allow for video calls?
    - Is this irrelevant completely since rule 8.14.8 doesn't allow any device in the open and visible possession?
- Rule 9.2.1

We agree with comments previously submitted by the CCCA and other Counties

- 21.4.11(g)(1) – BMD misspelled.

25.2.2(e) – We are in support of this rule. Moves RLA submission to the next day and allows for additional processing time and verification.

25.2.2(l) – We are in support of this rule Moves RLA 1st round start date to Monday instead of Friday.

Emergency Rules

20.5.4 – We are in support of these rules. Clarifies and limits who may access voting system.