



July 7, 2017

The Honorable Wayne Williams  
Secretary of State  
Department of State  
1700 Broadway  
Denver, CO 80290  
SOS.Rulemaking@sos.state.co.us

**Re: Proposed Rulemaking, Rules 7.9.9 and 8.15.8.**

Dear Secretary Williams:

New Era Colorado Foundation is a multi-issue organization committed to engaging, educating, and training a new generation of active citizens and young leaders in Colorado. Thank you for the opportunity to comment on the proposed rule changes.

**Rule 7.9.9.** | New Era Colorado is in favor of the requirement to measure and record wait times at VSPCs but would like to see this rule go further and require counties to post wait times on their websites in real time or at least several times per day during early voting and hourly on the last Monday and Tuesday of the election. Our organization would benefit from having this information because it would allow us to send it out to our members and help direct voters to a VSPC where they can vote in a timely and convenient manner. Voters would be able to make better decisions about which VSPC to visit in their county, and their improved experience would increase their trust and perception of Colorado's election system. This is the type of service and information that voters are accustomed to for other services, so bringing this transparency to voting is an obvious next step.

**Rule 8.15.8.** | New Era is opposed to this additional requirement for watchers, as we believe it is burdensome and unnecessary. Current rules already mandate that watchers are not permitted to use phones or other electronic devices to make or receive calls, or to take or record any pictures, videos or audio in any polling place or other location where election activities occur. The proposed rule prohibiting all phones on the watchers would limit their ability to report and resolve issues in real-time. Frequently, watchers have to park and walk to get to the VSPC and this potential inconvenience could add barriers to them being able to do their jobs.

Thank you again for allowing New Era Colorado Foundation the opportunity to comment on this rulemaking. If you have any questions regarding our comments please don't hesitate to contact us.

Sincerely,

A handwritten signature in black ink that reads "Lizzy Stephan". The signature is written in a cursive, flowing style.

Lizzy Stephan  
Executive Director  
New Era Colorado Foundation  
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