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January 23, 2018

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

Re: Election Rules – 8 CCR 1505-1 – Proposed Rules Issued January 16, 2018

Dear Secretary Williams:

We support the proposed Rules and recommend the following modifications.

**Rule 10.9.2:** We support this rule. Since tabulation no longer happens at scanning, it doesn't seem beneficial to rescan ballots. We recommend adding on line 12, after "25.2", "AND BALANCED TO SCORE REPORTS".

**Rule 10.9.5:** We support this Rule. It is beneficial to have this information written out.

**Rule 10.12.2:** We recommend more clarification on this Rule. Is it only directed at counties that conduct ballot polling? Proposed Rule 10.9.2 appears to be in conflict so further clarification might alleviate this concern.

**Rule 10.12.2(a)(3):** We recommend changing the word "MUST" to "MAY". Allow counties to use their original test decks.

**Rule 10.13.3(a):** We recommend defining "marginal mark".

**Rule 25.2.3(D):** We recommend clarifying that the report is submitted to the Secretary of State.

Thank you for considering our feedback on the proposed rules.

Sincerely,



Christi Coburn  
Chief Deputy

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