

From: Mary Eberle
To: [SoS Rulemaking](#)
Cc: [Cathy Jarrett](#); [Harvie Branscomb](#)
Subject: proposed 2018 election rules
Date: Tuesday, January 23, 2018 10:57:11 AM

Dear Secretary Williams,

Here are a few comments on the proposed 2018 election rules.

1. I support Cathy Jarrett's suggestion about a more robust test of automatic signature verification machines. Human testing of an already-known result (instead of an unknown result) is not useful in any way. I have seen the current method in action in Boulder County, and it was completely useless.

2. I support Harvie Branscomb's input that will clarify and improve election procedures, including

- (a) the RLA approach, including requiring number of ballot styles in an audited contest to be considered,
- (b) more ballot cards to be tested than has been proposed, and
- (c) early redaction to preserve voter privacy and ballot anonymity.

3. In 10.4, "who" is meant by "a county"? It should be a bipartisan team of judges. Please clarify.

4. In 10.12.22 (b), the rule should require bipartisan teams of judges.

5. In 25.1.10, I do not think the SOS alone should be selecting the target contest. That was fine for the first time (November 2018). Target contests should be selected randomly. The canvass board should randomly select one or more contests in their county as well, and local contests should be considered in this selection. These contests should be included in the definition of target contest. Other contests should also be able to become target contests in addition to the randomly selected ones if these other contests are subject to public interest and/or concern.

6. Not included in your list of proposed changes:

- Correct the definition of "cast" to comport with the standard meaning of the word.
- Add processes, scanning equipment, and facial photographing to drop boxes to allow confirmation of the time of casting and who casts each ballot (via facial recognition).
- Determine a way to prevent people from voting via the UOCAVA system who are not overseas or out of state.

Thank you for considering these comments.

Mary C. Eberle

