

**From:** Eric Carlson  
**To:** [SoS Rulemaking](#)  
**Subject:** Colorado Rules Concerning Lobbyist Regulation (8 CCR 1505-8).  
**Date:** Friday, February 23, 2018 6:30:11 PM

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I have reviewed the proposed changes to the subject referenced rule.

As a self employed lobbyist whom to date has been a volunteer I am pleased with the clarifications of roles for a professional lobbyist reporting.

I am very satisfied with the changes on reporting with one exception. I feel the reporting of changes for positions on a specific bill needs to be changed. Often as language is modified a position changes and clients can be added or terminated. but having the 24 hour notification on client changes and 72 hours on a change in position is onerous and serves no real purpose other than an acknowledgement that changes have occurred. the monthly report can serve as the transparency required by the statute. Adding this additional administrative burden only raises the cost to the client.

The public can access the monthly report and see all changes

Sent from my Verizon, Samsung Galaxy smartphone