

**From:** James Evans  
**To:** [SoS Rulemaking](#)  
**Subject:** Comments - working draft notary rules  
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My comment concerns the proposal to change the qualification for notarial status by amending the previous qualification renewal status from a “grandfather” process (whereby one has already taken and passed an exam to qualify once without taking another exam) to that of a requirement to take (and pass, of course) an exam during every renewal period.

The point I wish to make is that the amount of additions, amendments, and/or removals to the qualification regulations and to the actual regulations under the notarial process are not substantial enough to support such a requirement. Perhaps if the Office of the SOS considered this point they might wish to cover a testing period renewal span that would encompass a period that would reflect a larger quantity of such changes, say, in the normal course of time. This might occur, perhaps, every other renewal or at the point of a third time renewal. I suggest that it is somewhat excessive to require testing every renewal.

This touches, of course, on renewal for an existing notary and not a newly minted notary.

Personally I am not at all concerned about testing and passing an exam. Any approach that maintains professionalism in any process is desirable. However, to simply implement such an action without a substantial need to ensure that notaries are current due to an increase in adds, cuts or modifications is merely excessive administration.