

July 24, 2019

The Honorable Jena Griswold, Secretary of State
Department of State
1700 Broadway
Denver, CO 80290

Via email to: sos.rulemaking@sos.state.co.us

Re: Second follow-up letter to proposed rules to implement new legislation and clean-up revision.

Submitted in tandem by Colorado Common Cause, New Era Colorado, and America Votes, the recommendations below constitute a follow-up letter on the revised draft of the secretary's proposed 2019 rule additions and changes. Thank you for the opportunity to comment on the second draft of the proposed election rules.

Rule 7.1 covering election plans: The group reiterates its original recommendations, clarifications, and additions to this section in the spirit of HB19-1278, Modifications to Uniform Elections Code, and hopes they are included in the creation of the form. As organizations with expertise in voter-centric elections and representing numerous stakeholders, we urge the secretary's office to include the public when drafting the election plan forms that the county clerks will have to complete.

Rule 7.9.8 covering wait times: We seek further clarification on what the "written guidance" will be and what that will include. Additionally, we believe that "wait time" should be defined and that the definition should be descriptive so that it is uniform across all the counties. The entire wait time should encompass from when a person enters a line to then they enter the voting booth or otherwise complete their time at the VSPC. Wait time should not simply include the time spent in the first line. Finally, clerks will require the ability to record wait time information in SCORE.

Thank you for the opportunity to comment.

Sincerely,

Amanda Gonzalez
Executive Director
Colorado Common Cause

Lizzy Stephan
Executive Director
New Era Colorado

Kelly Byrne
Colorado State Director
America Votes