

## Comments regarding proposed SOS Rules

Hearing date: September 16, 2025

1. New Rule 6.1.8 – This addition is greatly appreciated; thank you!
2. Rule 7.7.8 – My only comment on this rule is that if counties were allowed to use a bipartisan team of judges at Tier 1, the need for signature verification audits wouldn't be necessary.
3. Rule 7.8.12 – This rule creates another unfunded mandate that some counties may not be able to comply with. Rural areas often have a hard time with internet services, have limited space in their VSPCs, and are already required to provide access to the hotline. Requiring another "screen" might mean additional computers, laptops, IT services, or technology-related costs in areas that never see a voter requesting the multilingual ballot. Costs have already increased astronomically since VSPC implementation—requiring this is unnecessary when most people carry iPhones with FaceTime capabilities.
4. New Rule 7.9.4 – This rule presumes that the designated individual *isn't* the county clerk. Therefore, this is a ridiculous requirement for counties with two or three staff members. Most small counties collaborate, working multiple jobs at once (election, MV, recording, etc.), which rule makers constantly seem to forget. Asking one person in a small office to hold this responsibility, particularly "ensuring that the county clerk complies with federal and state law requirements," presumes that individual staff members have far more authority than they are comfortable with or the county clerk allows. Please think of small counties when implementing rules. We are happy to comply with the rules and follow the law (and have done so for years), but putting pressure like this on a single employee is unreasonable. Consider rewriting this rule in a way that allows the county clerk to take on the responsibility instead of a staff member.
5. Rule 7.15 – I question why the state has removed the section regarding the waiver. Were a lot of counties doing it? If so, it proves we don't have enough time to complete this process. If not, why not leave it in the rule for those counties (again, please consider the small counties) with minimal staff, maximum duties, and little time?
6. Rule 10.2.2 – Appreciate the clarification!
7. Rule 10.3.2 and 10.11 – Also appreciate this!
8. Rule 10.6.1, 11.2.1, 11.3.1 – This makes sense – thank you.
9. Rule 16.1.3 – LOVE THIS! Thank you so much—we have many voters designated as UOCAVA who have received mail ballots with in-county addresses for YEARS!

10. Rules 16.1.6 and 16.1.7 are good; the revision to 16.2.2 and repeal of 16.2.6 are GREAT!
11. Rule 18.3.3 – This is a welcome change.
12. Rule 19.3.4 – I don't understand (and never have) the July 31 deadline. Why can't this be the calendar year?
13. Rule 20.1.2 – Is this asking how many surveillance cameras are required or how many we will use of the number required? Confusing verbiage.
14. New Rule 20.4.4 (c) – What is the rationale for this? Our “keycard access” is a small button attached to the judge's ID badge. Where else would they put it? Sometimes they have enough trouble keeping track of their ID badges. Requiring them to carry something else separately will only cause more problems, such as forgetting where they put it or leaving one or the other behind in a different room. It's hard enough to get elderly judges to wear the name badge—at least if access to the room is already on the badge, they don't have to worry about that too. Please reconsider this additional rule.
15. Rule 20.4.5 – Would the state be willing to track this going forward so that counties don't realize at the last minute that someone hasn't completed a security assessment before the deadline?
16. Rule 21.3.7 – Part of this wording seems strange. Maybe “by Secretary of State staff members” instead of “by member of staff for the Secretary of State”?

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