

**Clear Ballot Comments to Proposed Rulemaking
as Promulgated by Colorado Department of State-Elections-8 CCR 1505-1**

Clear Ballot, one of the two voting systems certified for use in Colorado, is concerned that the proposed language for 21.4.12(c) does not provide adequate information to allow a voting system to meet the requirement and be certified in CO. Clear Ballot understands and accepts that the specific format may need to change over time and that it could be beneficial to leave those details out of the formal rules. However, for the benefit of county election officials in Colorado, the state must collaborate with the manufacturers to ensure compatibility. This would include:

- Making the current format specification available at all times
- When changing the format, sharing the format specifications in a reasonable period of advance notice ahead of the format going into effect
- Collaborating with manufacturers for testing the CVR format's compatibility with the state system
- Allowing for a transition period in which the manufacturer can enable counties to produce the required format, keeping in mind the timeline constraints of certification.

Respectfully submitted on September 16th, 2025