



LEAGUE OF
WOMEN VOTERS®
MINNESOTA

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December 16, 2013

Via email

Judge Eric L. Lipman
Office of Administrative Hearings
600 North Robert St.
P.O. Box 64620
St. Paul, Minnesota 55164-0620

RE: Comments by League of Women Voters Minnesota regarding Proposed Amendment to Permanent Rules Relating to Elections

Dear Judge Lipman:

League of Women Voters Minnesota submits these comments on the Proposed Amendments to Permanent Rules Relating to Elections. LWV Minnesota also requests the opportunity to make comments orally at the hearing on Jan. 3, 2013.

League of Women Voters is a non-partisan organization that encourages informed and active participation in government and influences public policy through education and advocacy. Ensuring that every eligible citizen has access to the ballot box is fundamental to our organization's history and our mission today.

LWV members across Minnesota volunteer their time to help register voters in a variety of settings, including high schools and community colleges. Many of our members serve as judges on Election Day. Through our work, we occasionally see unnecessary barriers that voters encounter when trying to register to vote and cast a ballot.

Some citizens seeking to register to vote on Election Day bring proofs of identity or address which common sense would indicate are acceptable, but in fact they are not acceptable under current Minnesota rules. Modifying the types of documents available for Election Day registration to comply with a voter's common sense is advisable where the additional types of documents credibly reflect identity and address. Moreover, because of the 2013 legislature's reduction in the number of people a registered voter can vouch for, widening the set of permissible documents is necessary and reasonable to ensure that every citizen who wants to vote is able to vote.

Election Day Registration – Proof of Identity

LWV supports as necessary and reasonable the changes proposed to Rule 8200.5100, subp. 2 regarding documents acceptable to establish identification and address for a person registering to

vote on Election Day. Specifically, we support acceptance of a driver's license, learner's permit or identification card issued by the state of Minnesota *or any other state*.

LWV members serving as election judges have encountered citizens who have recently moved to Minnesota from another state and meet requirements for voting here, but who do not yet have a Minnesota driver's license or identification card. Driver's license and identification cards from every state in the union are accepted in a variety of settings all over the United States to establish a person's identity. LWV Minnesota supports acceptance of these documents for voter registration in Minnesota, together with proper documentation of address.

LWV Minnesota also supports a student identification card issued by a Minnesota secondary school as an acceptable method to establish identify. Many Minnesotans become eligible to vote in their senior year of high school when they become 18 years of age. If they are not yet driving, their only proof of identity may be their student ID which contains their name and photograph. Requiring such students to obtain a state ID card prior to voting places an unnecessary, costly barrier before them when they already have a high school identification card. Failing to provide an alternative method of establishing identify for a high school student who does not have a driver's license or state identification card but has a high school ID is not reasonable; a successful experience for a first-time voter makes it more likely that the voter will continue to vote.

Election Day Registration - Proof of Address

LWV Minnesota supports as necessary and reasonable the expansion of the documents acceptable to prove address. We specifically support acceptance of a start-of-service notification because a voter who has recently moved into a precinct and started services at his/her new residence may have not yet received an account statement by Election Day.

Second, credit card and bank statements should be accepted as proof of address. Our members who serve as election judges state that credit card and bank statements are sometimes brought into the polling place as proof of address because the voter does not have utilities in his or her own name. This is particularly true of those in rental housing, especially college students. College students are often first-time voters; a successful registration and voting experience for a first-time voter makes it more likely that the voter will continue to vote. Credit card and bank statements credibly reflect a voter's address and thus it is reasonable to include them as acceptable proof of address.

Finally, LWV Minnesota believes that statements for rent or mortgage payments and residential leases (reflecting validity through Election Day) should be added to the documents for proof of address. Our members who serve as election judges frequently tell us that voters bring in these documents, which directly show their home address, and are surprised when these are not acceptable forms of establishing address. LWV Minnesota recommends adding these

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documents because they credibly show address and comport with a voter's common sense method of demonstrating their address.

Electronic Display of Bill

Acceptance of electronic original bills as a means of establishing address is also necessary and reasonable. More and more, purveyors of a variety of services urge their customers to use electronic billing as a means of reducing postage and use of resources. Many customers have opted for this means of billing. Showing a bill in this manner is already current practice in polling places. Putting this language into the rule is necessary and reasonable to comport with billing practices in the 21st century.

LWV Minnesota requests notification of the date the administrative law judge's report on the proposed rules becomes available. LWV Minnesota also requests notification of the date the Secretary of State's Office adopts the rules.

Thank you for this opportunity to comment on the proposed amendment to the rules governing elections.

Sincerely,



Susan Sheridan Tucker
Executive Director