

Michael D. Briggs
369 Mesa Way
La Jolla, CA 92037

April 28, 2010

Gloria Gamino, Legal Analyst
Bureau of State Audits
555 Capitol Mall, Suite 300
Sacramento, CA 95814

Re: Notice of Proposed Rulemaking
The Voters First Act

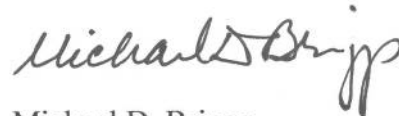
Dear Ms. Gamino:

After review of the proposed regulations, I have comments and recommendations regarding proposed §60859 and §60863. The first sentence of §60859 bars the first eight members of the commission from certain communications with specified people without a time limit. While there seems to be a natural time limit regarding communications concerning “the selection of the final six members of the commission” there seems to be no natural time limit on “their role as members of the commission” unless the word “their” only applies to the final six members. If the intent is to limit the word “their” to the final six members (which is unlikely), then that should be clarified. A better solution might be to have a sunset provision on this clause (such as when the final six members are selected), or at least on communications regarding the role of the original members of the commission. Certainly, the intent is not to restrict the original eight members while permitting the final six members to engage in communications about their role.

An ancillary issue is whether a similar restriction on communications should be added to proposed §60863 when a substitute commission member needs to be selected because of a vacancy (which is likely to occur someday) and have it apply to all members of the commission.

Thank you for this opportunity to submit my comments.

Very truly yours,



Michael D. Briggs
mbriggs@san.rr.com