

PHILADELPHIA CITY COMMISSIONERS
Response to Committee of 70 June 2010 Recommendations

This document has been prepared as a partial response to the Report or paper issued by the Committee of Seventy in June 2010 titled “Five Easy Ways to Improve Local Elections”. The City Commissioners will respond to the recommendations separately in segments, one for each of the recommendations.

This segment is in response to the first Seventy recommendation “Bring the Website into the 21st Century”

Committee of 70 June 2010 Report

SEVENTY: 1. BRING THE WEBSITE INTO THE 21ST CENTURY

The City Commissioners’ website – www.phillyelection.com – is woefully inadequate, assuming the ordinary user can find it at all.

CCO RESPONSE: The “ordinary user can find” the City Commissioners website in the same manner that the ordinary user finds other County / City Agency or City Department websites on the Internet – at the City’s website: www.phila.gov.

The user simply needs to go to the City’s homepage at www.phila.gov, click the **Find** link in the left hand column, move the cursor down to **Voter Information** and click again. The user will be taken to the City Commissioners website homepage at www.phillyelection.com.

Additionally, the ordinary user could simply do an Internet search as I did with the following results:

- An AOL Google search for **Philadelphia elections** returned the Home Page for the City Commissioners as the 2nd listing on the 1st page, under a title of Philadelphia County Voter Registration with the www.phillyelection.com link, right above a return for the Committee of Seventy Home.
- An AOL Google search for **Philadelphia voter registration** returned the Home Page for the City Commissioners, as well as links for the Commissioners web pages for Voter registration Information, New Voter Registration Requirements, Election process for people with disabilities, 2010 Important Dates, How to Vote and Voter Identification as the 2nd listing on the 1st page. The 3rd listing on the page was also for the City Commissioners site mentioning the Mission Statement of the City Commissioners, under a title of Philadelphia County Voter Registration with the www.phillyelection.com link, right above a return for the Committee of Seventy Home page which was the 4th listing on the page.
- AOL searches for the following terms resulted in the corresponding listed returns:
 - **Philadelphia voting** – CCO Home page 2nd on 1st page, **70** 4th on 1st page;
 - **Philadelphia absentee ballot** – CCO Home page 1st on 1st page, **70** 2nd on 1st page;
 - **Phila board of elections** – CCO Home page 2nd & 3rd on 1st page with **70** listed 5th;
 - **Philadelphia voting information** - CCO Home page 1st & 2nd on 1st page with **70** 7th;
 - **Philadelphia polling place** – **70** Home page 1st on 1st page, **70’s** polling place listings 2nd on first page, followed by the CCO Home page indicating POLLING PLACE LOCATIONS under the title Philadelphia County Voter Registration as the 3rd return on the 1st search results page.

Despite having deleted all browser history, temporary files and cookies, I wanted to try a second search engine for due diligence. I opened **Internet Explorer** and used **Yahoo search** for the following terms with the corresponding results:

- **Philadelphia voter registration** returned the Home Page for the City Commissioners, as well as sub-links for the Commissioners various web pages for 1st listing on the 1st page. The phillyelection.com site was also the 2nd link on the 1st page. The Committee of Seventy link was not listed on the 1st page.
- **Phila voters registration** returned the Home Page for the City Commissioners, as well as sub-links for the Commissioners various web pages for 1st listing on the 1st page. The phillyelection.com site was also the 2nd link on the 1st page. The Committee of Seventy link was not listed on the 1st page.
- **Phila voter registration** returned the Home Page for the City Commissioners as the 2nd & 3rd listing on the 1st page. The Committee of Seventy link was not listed on the 1st page.
- **Philly voter registration** returned the Home Page for the City Commissioners as the 9th listing on the 1st page. The Committee of Seventy link was not listed on the 1st page.
- AOL searches for the following terms resulted in the corresponding listed returns:
 - **Philadelphia absentee ballot** – CCO Home page 1st on 1st page, **70** 2nd on 1st page;
 - **Philadelphia board of elections** – CCO Home page 1st & 2nd on 1st page with **70** listed 6th;
 - **Philadelphia voter information - 70** listed 7th, with CCO Home page 7th on 1st page ;
 - **Philadelphia polling places** – **70** Home page 1st on 1st page, 70's polling place listings 2nd on first page, the CCO Home page was not listed on the 1st page.
 - **Alternative Ballot** – The CCO site is listed 1st with **70** listed 4th on the 1st page.

The City Commissioner's website is easily located via the City of Philadelphia's home page link for Voter Information. Additionally it is obvious an Internet search using any variation of voter registration or election terminology prefaced with Philadelphia, Phila, or Philly should enable the ordinary user to locate the site as easily as locating the Seventy site.

SEVENTY: Minimal information is provided and its format is amateurish at best. The May 18, 2010 primary election results are available under an obscure heading with an incorrect year: "2009 Municipal General Unofficial Election Results." A "new" feature, Language Interpretation Services for Voters, dates from 2007.

SEVENTY: Minimal information is provided and its format is amateurish at best.

CCO RESPONSE: The Committee of 70 asserts that minimal information is provided on the City Commissioners website but the Commission's bilingual English / Spanish website provides the necessary and required information for Philadelphians to learn the:

- City Commissioners Mission Statement, or major functions of the Department;
- Important Election Dates, including the deadlines for submitting an application to register or an application for an Absentee or Alternative Ballot;
- qualifications required to register to vote;

- methods and locations for obtaining, completing and submitting an application to register to vote, including the requirement that applicants provide a PA Driver's License or PA Non-driver ID number - or the last four digits of a Social Security number if the applicant does not have a PA Photo ID;
- qualifications to vote by Absentee Ballot and Alternative Ballot;
- methods and locations for obtaining, completing and submitting an Absentee Ballot or Alternative Ballot;
- requirements for registrants voting in a Division, (election district) for the first time to show approved identification to Poll Officials and a list of all approved forms of ID;
- manner in which voters select and vote for candidates or on ballot questions on the electronic voting machines used in every Division or election district polling place, both written text with photos, and a short public service announcement video will be added in the near future;
- requirements for certain registrants to vote on a Provisional Ballot at the polling place instead of the voting machine;
- language interpretation services available at polling places;
- Statement on Access to the Election Process for People with Disabilities detailing the various degrees of accessibility of polling places, and additional information regarding the emergency Alternative Ballot process and the designated Central Election Day alternative voting.

The City Commissioners website also provides information for Polling Place Officials including:

- a schedule detailing the locations, dates and time for up to 200 training sessions for Polling Place Officials; and
- a 20 minute Training video on setup, opening, using, and closing the electronic voting machines.

Again, while Seventy views the information as minimal and the format as amateurish, we believe the site presents the required information without unnecessarily complicating the process with densely worded paragraphs. The text is simple and straight-forward providing the information needed by the ordinary user to register and to vote.

The City Commissioners site also provides a link to the Pennsylvania Department of State's voter information site, www.votespa.com. The Commonwealth's site provides additional information on registration & election; limited information in non-mandated languages such as Chinese, French, Khmer, Russian, Korean, and Vietnamese; and election and registration application forms that can be downloaded. The Commission staff has been instructed to, and routinely refers telephone callers inquiring of downloadable forms to the VOTESPA site on a daily basis for downloading of the necessary forms.

SEVENTY: The May 18, 2010 primary election results are available under an obscure heading with an incorrect year: "2009 Municipal General Unofficial Election Results."

CCO RESPONSE: The City Commissioners personnel normally do not update that link title until mid-day on the date of the next election at the administrative deadline for emergency production of voting machine memory cartridges, when the database is closed and prepared for the receipt and tabulation of Unofficial Election night returns. Obviously in the midst of all of the other responsibilities, it was

missed and not updated to read 2010 Primary Unofficial Election Results. When it was brought to our attention it was corrected.

However, it is also obvious all of the other tasks required for preparing an accurate election database, production of machine materials, preparation of the election database, loading of the database on the backup servers and 21 laptop workstations used for reading memory cartridges performed well without error, within tight time constraints, as they have been since the implementation of the system in 2002.

SEVENTY: A “new” feature, Language Interpretation Services for Voters, dates from 2007.

CCO RESPONSE: We find nothing wrong with having content described as new with the date 2007 on the site as late as May 2010. Given the unfortunate fact that many voters only vote once every three, or four years, such information IS new to many voters. The “new” and the date in the link title alerts such voters to changes that may have occurred since they last voted, and when they changed.

It is simply amazing how many times we answer a question about procedure only to have the applicant, or registrant respond “When did they change that”.

SEVENTY: City voters seeking the location of their polling places must connect to a Commonwealth of Pennsylvania website. And, as the volume of calls received by Seventy every Election Day confirms, voters relying on the City Commissioners for location changes are often left in the dark. Even the wife of the city’s Voter Registration Administrator didn’t learn that her polling place had changed until she showed up at the wrong location on May 18th.

CCO RESPONSE: If one were to ever search for a short paragraph full of misrepresentation, distortion, and omission based upon a lack of understanding and knowledge of the law, the systems, the procedures, and the efforts of the Commission in informing electors of polling place locations – this would be in the running.

SEVENTY: City voters seeking the location of their polling places must connect to a Commonwealth of Pennsylvania website.

CCO RESPONSE: Notice Seventy states “must connect to a Commonwealth of Pennsylvania website”. It’s the Internet – meaning the voters merely click on a link that takes the voters directly to the Commonwealth’s polling place locator webpage. We are not making the voters drive the turnpike to Harrisburg. It’s a mere click away.

In order to understand why the City Commissioners and the staff have decided that City’s voters should connect to a Commonwealth of Pennsylvania website to an online polling place locator application one would have to have a basic knowledge of the mandates of the Help America Vote Act, (HAVA), complying Pennsylvania voter registration and election law, the mandated systems and procedures, and consider budgetary justifications. Not only does the Commission’s website have City voters connect to a Commonwealth of Pennsylvania website to use an online polling pace locator application, but City Commissioners personnel MUST connect to a Commonwealth of Pennsylvania computer system and database and to perform daily processing and file maintenance tasks on voter registration and election files.

HAVA not only mandated changes in voting equipment but also mandated that each of the States procure statewide voter registration systems and use them as the official “lists”, (databases) of voter registration. Pennsylvania law requires that all counties use the Commonwealth’s Statewide Uniform Registry of Electors for its files of eligible voters and other election files. The counties are mandated with the responsibility of maintaining the accuracy and currency of its county registration records on the Commonwealth’s SURE database in Harrisburg using Commonwealth equipment (thin client WinTerms) and software. County registration personnel must use SURE to process all registration / absentee applications, perform registration and election file maintenance, and generate all reports / exports.

Once an application is processed and approved, or a record is changed, the SURE system generates a Voter Identification Card which contains the voter’s information, the voter’s assigned election district and the location of the polling place for that election district. The SURE system also provides election modules for Philadelphia personnel to maintain the accuracy and currency of its polling place locations.

The voter and election records in the SURE system are mandated as the Official files for the county. Additionally the Commonwealth established and maintains at State expense, a polling place locator application on its voter information website, www.VotesPA.com, using the data in these official files.

Since the Philadelphia County polling place data file on SURE is the Official record, used to print the Official Voter ID Cards and maintain the Secretary of the Commonwealth’s official registration and election website’s online polling place locator, it is updated by Philadelphia City Commissioners personnel before any updates are performed on any non-mandated county files, spreadsheets, or databases.

The City Commissioners find no common sense whatsoever in expending additional county labor and financial resources in developing, deploying, and maintaining a county application and database for use on it’s website that would merely duplicate the services provided by the Commonwealths at State expense. The placement of a direct link to the Commonwealth’s webpage for the State’s polling place locator application inexpensively provides City voters with an alternative in seeking the location of their polling place.

Ironically Seventy, in its online Voting Rights and Procedures in Philadelphia makes numerous references to the Commonwealth’s VOTESPA website as a source for various information and forms, including locating polling places.

While this section of Seventy’s report specifically concerns the Commission website it is important to note that no City voter MUST connect to a Commonwealth of Pennsylvania website to seek the location of their polling place. The VOTESPA online polling place locator webpage is not the only source for City’s voters to find the location of their polling place.

Polling place locations are printed on every Voter Identification Card generated from work in the SURE system. The Voter ID card also includes the voter’s assigned election district, or Ward and Division numbers. Since converting to the system in January 2006, the City Commissioners have mailed 989,195 SURE Voter ID cards containing the voter’s respective polling place location.

Many voters may chose to find or verify the location of their polling place in the same manner they did before the Internet existed.

Every polling place location, (Ward number, Division number, facility name and street address), is listed in numerical order by Ward & Division in extensive, and very expensive, multi page Election advertisement in three major City newspapers. The polling place advertisements appear in the Philadelphia Tribune the Tuesday before each election, and the Philadelphia Inquirer and Daily News the Monday, or day, before the election. The advertisements include telephone numbers for voters to call if they should have any questions regarding the location of their polling place.

Voters can use the Ward & Division numbers on either their SURE Voter ID card or the prior Voter ID generated by the Commission's county registration system in years prior to January 2006. Both forms of ID cards have a telephone number printed on them for the Commission's Voter Registration Division.

Voters can call any of the City Commissioners Offices. The SURE Find Voter module provides a District tab in the application for viewing voter record for Commission personnel to use to determine the location of a voter's polling place on-screen when answering personal or telephone inquiries. The Commissioners names, office address and telephone numbers are prominently located on the home page of Commission's website. The Voter Registration Office address and telephone numbers are prominently located at the top of the webpage for Voter Registration Information, and the County Board of Elections address and telephone number at the top of the Absentee Ballot webpage.

The Voter Registration Division's Polling Place Unit distributes city-wide polling place lists to political party committees and members, candidates, unions, community organizations and organizations concerned with elections upon request.

Finally, immediately preceding each of the last three Federal General elections in 2004, 2006 and 2008, the Commission mailed voter-specific bilingual HAVA Voter Education postcards to each registrant qualified to vote. These postcard notices included the voters personal information, their election district (Ward/Division), the location of their polling place, accessibility information for disabled voters and whether the voter needed to show ID or sign an Affirmation of their residence before voting on the voting machines. The Commission budgeted HAVA grant funds to pay for the printing and postage for these mailings. Unfortunately, the Commission did not have sufficient grant funds, or City funds within its budget provided by the City to pay the approximate \$440,000 per election cost of mailing these notices again in October 2010.

Even if the notice content and size was reduced to the voter's personal information, the date of the election, the time the polls were open, and the location and accessibility of the polling place, it would still cost hundreds of thousands of dollars to mail a notice to each registrant each election. The Commission has never had any funding appropriated to mass mail such notices.

However one feasible consideration may be eliminating the extremely expensive full page polling place locations advertisements in the Philadelphia Inquirer, Daily News, and Philadelphia Tribune. The funds used for these paid advertisement could then be appropriated and replaced with the mass mailing of small postcard election notices to each registered voter, or each household, one week before each election. The City could reduce the Procurement Department's advertising budget by the cost of

the current ads, appropriate sufficient funds to the Commission for vendor printing of the notices from SURE exports and postage for automated rate mailing, and use any savings for other purposes. This would likely cost less than the current paid polling place advertisement in the print media. Not only may this change reduce costs to the City, but a mass mailing would certainly be more effective reaching almost every registrant, far more than the print media given ever decreasing newspaper circulation numbers. Additionally, such mailings that are returned undeliverable by the Postal Service can be used as a compliant source for mailing forwardable Address Verification Notice to the registrant as an additional component of the Commission's voter update / voter removal programs.

This option was previously discussed by the Commissioners and the staff when meeting with print media personnel in a successful effort to reduce the high fees charged by the Inquirer and Daily News. It may be advisable to consider this alternative although it may require amending State law to permit the counties more flexibility as Philadelphia is currently mandated to print Election Notices in 2 major daily newspapers. This option would insure that those who do not the read the location on the ID card, or have an old ID card and do not check newspaper, websites, or others methods before each election as every registrant, or household, would receive a postcard notice in their mail box every election.

SEVENTY: And, as the volume of calls received by Seventy every Election Day confirms, voters relying on the City Commissioners for location changes are often left in the dark.

CCO RESPONSE: Unfortunately we do not have a public or government facility located within the boundaries of each of the City's 1,687 election districts. The Commission must use private facilities in its attempt to keep polling places within reasonable walking distances, especially in high density areas that offer little or no parking and areas where a majority of voters walk to the polls. Use of private facilities is contingent upon the owner permitting usage and that owner approval can change from election to election.

This is exacerbated by the fact that many of the government facilities, including many schools, and even the private facilities do not meet the detailed and strict requirements of the Americans with Disabilities Act due to the age of the facilities. The City and the City Commissioners, in response to ADA litigation by private plaintiffs and enforcement action by the US Department of Justice, (USDOJ), entered a Settlement Agreement in US District Court.

The Agreement requires that USDOJ and a private vendor inspect every polling place facility in accordance with an agreed upon Accessibility Survey form and make recommendations for temporary modifications to provide independent access for disabled voters. If the USDOJ or the vendor finds that a facility is not accessible and cannot be modified then they seek and provide potentially accessible alternative facilities and recommend the location be changed.

Due to its knowledge that polling place distance substantially impacts voter convenience and turnout, especially for elderly or mobility challenged voters, the Commission has had a longstanding policy that polling places be located within the boundaries of the subject, or a directly adjacent, election district. The Commission insisted that the Agreement require any alternative location recommendation by USDOJ or the vendor be within the boundaries of the subject election district or an adjacent election district and be no more than 5 city blocks from the subject district's furthest boundary. In accordance with this requirement the Commission staff has rejected numerous initial recommendations from the vendor.

If the Commission fails to have the modifications in place on Election Day or fails to change the polling place locations USDOJ or the Plaintiffs can seek enforcement action by the Court.

The Commission is also aware that changes in poll locations also impacts voter convenience and strives to maintain polling places in the same facility election after election, year after year, a goal that often clashes with the reality of having to use private facilities and the mandates of law and litigation.

The Commission conducts Public Hearings whenever there is a recommendation to change a polling place from an available facility to another location. In accordance with Pennsylvania law, Commission personnel post Public Notices of these Hearings. These notices are posted on the current facility, the proposed facility and in three other prominent locations within the voting district. These posted Public Notices include address of the current and proposed locations, and the date, time and location of the Hearing. Similar Notices of any proposed changes are forwarded to the major political party committees and the party Ward Leaders.

If the City Commissioners approve a change recommendation at a Hearing, then upon return to the office Commission personnel update its SURE polling place file which will automatically update what is printed on Voter Identification Cards and what is displayed on the Commonwealth's polling place locator webpage that is linked from the City Commissioners website.

The Commission personnel also updates the files used to create its exports provided to the major newspapers for preparing the paid polling place advertisements published immediately preceding each election, and the listings provided to candidate, committees, organizations, and the public upon requests and the detailed report used by contract truckers in delivering the voting machines.

In the week immediately preceding an election Commission personnel hang Polling Place Location posters in all election districts where a polling place has been changed since the preceding election. These notices are posted on the old facility, the new facility and in three – five prominent locations within the election district.

SEVENTY: Even the wife of the city's Voter Registration Administrator didn't learn that her polling place had changed until she showed up at the wrong location on May 18th.

CCO RESPONSE: Seventy's misinterpretation and misrepresentation of the facts and my comments at a Commissioners meeting, regarding my wife's experience last election, and Seventy's consistent mention of this incident is the proverbial mountain out of a molehill.

My assigned polling place was found inaccessible by the Settlement Agreement survey vendor due to a non-compliant slope of the property driveway and permanent concrete entrance ramp. The Settlement Agreement required that the location be changed to an accessible facility and the vendor recommended a nearby sports association gym. During the Hearing on the change the Commissioners granted a request by a Ward Leader for additional time to check with a few private facilities, including a church, that were ½ block closer to the Division. The Commissioners provided one week, then a second. Meanwhile the Commission staff surveyed the vendors proposed location and after obtaining approval for voters to cross the gym floor found sufficient space and an accessible entrance to move the Division into the gym. The Commissioners approved the change to the new location at least 20 days before the election.

The Commission staff updated its SURE polling place file and the other files needed for the paid advertisements to reflect the change.

Normally my wife calls me every Election Day immediately after voting and tells me what number voter she was. It's just a tradition that lets me have an idea of the turnout in my district. On May 18th, she again called but from outside old polling place said "Why didn't you tell me they moved the polling place". I answered that "I guess I forgot to mention it". I also told her to look right across the street to the Gym where she should see the large pink sample ballots posted. We talked a little more, hung up and that was the end of it.

At the close of the City Commissioners meeting the day after the election, Wednesday, May 19, 2010, where supervisors were giving oral reports of the activities the day before, I mentioned that I had one final complaint. I then told them my wife called on Election Day and complained that I did not (personally) tell her the polling place changed. It was merely meant as a joke or relaying family banter.

Low and behold I received a call from someone telling me it's on the Committee of 70 website. Then I read it in the Seventy's June 2010 paper on recommendations to the Commission. Finally I heard from a fellow employee that Zach Stalberg was on NBC10@Issues and mentioned that my wife had went on the Commission's website and went to the wrong polling place. I have searched for the show tape to determine exactly what was said but have been unable to locate it.

Well, after hearing about the TV interview and reported comments I called my wife and told her what I had heard – that it was said that our website directed her to the wrong polling place. "You're kidding me – I never checked, or said I checked any website. How can he say that" was her response. I told her I never said she did either and told her I don't know exactly what was said because the show video has not yet been posted on NBC10 website, but given Seventy's past comments about what is said at our meetings I wouldn't be surprised.

I did call Seventy and speak to Ellen Kaplan and told her what I had heard was said and that it was simply not what happened, was not what I said at the Commissioners meeting when speaking about the Election Day call and told her exactly what occurred and what was said.

I've since tried on a few occasions to bring up the video on NBC10 website to try to verify exactly what was said during the interview to no avail.

While preparing this response I again questioned my wife regarding the May 18, 2010 primary. I asked her one simple question – "When you arrived at the old polling place was there a poster or sign on the door or wall? She answered yes. I then asked her what was on the sign and she responded that it had the location of the new polling place.

Had my wife taken advantage of any of the above mentioned methods for determining her polling place location she would have known the location of her new polling place before even leaving our home. Obviously she didn't, but the Commission's posting of the polling place change notice on the former polling place provided the last resort effort to inform her of the change and enabled her to simply cross the street to the gym and vote at little inconvenience. In fact, she could have done so without even calling me on Election Day at all.

Is Seventy implying that because I personally did not remember to tell my wife of the change, that it is indicative of anything more than just that? Well I'd like to go on the record that there is no way I can personally inform all 1,064,000 registrants of their polling place location, nor can I personally inform the potential 30,000 – 60,000 registrants in 50 – 80 Divisions where the location may change in an election due to owner refusal or litigation.

However, the Commissioners, and the staff consistently insure that the aforementioned efforts to inform registrants of polling place locations and changes are in place. We do whatever we can, given the resources provided, to inform voters of their polling place location and recent changes.

SEVENTY: By comparison, the websites of the Commissioners' counterparts in other major cities, and in Philadelphia's suburbs, are far more comprehensive, useful and inviting. The Allegheny County Elections Division publishes "Election Day Experience Reports." Chicago's Board of Election offers voter links in 12 languages. Montgomery County provides maps of election districts and links to candidates' campaign expense report filings. Chester County supplies sample ballots.

SEVENTY: The independent City Commissioners' office is not included in city government's massive information technology overhaul. But the expertise available within the city's Division of Technology should be able to assist in making the website respectable.

CCO RESPONSE: The City Commissioners and its voting system vendor have been working on an upgraded design of the Commissioner's voting system infrastructure since 2008. Cost and administrative obstacles in procuring certain required network equipment and the possible requirement for issuance of a new professional services contract for design, installation and configuration of new, upgraded equipment have delayed the project.

The City Commissioners have funds budgeted in its Federal HAVA Grants to upgrade the City Commissioner complete Electronic Voting System infrastructure at 8 City facilities, including all servers, routers, switches, load balancers, uninterruptible power supply devices, desktop workstations, and laptop workstations. The Servers have been delivered and the all desktop / laptop workstations are on order. We have obtained quotes for most required workstation and network software.

The voting system vendor and Commission personnel have a scheduled meeting with the City's Department of Technology to discuss available telecommunications technology to update the original system upgrade designs proposed by the vendor 2008.

The upgrade will improve all capabilities, and provide the necessary infrastructure to relocate the Commission's Public Access Results application and servers from the host site to the Commission's central tabulation and computation center at 520 N. Delaware Avenue.

Two remaining open issues are the procurement of Cisco network equipment and issuance of an RFP for the professional services to perform installation and configuration work. While those issues may seem simple, there are numerous obstacles. These issues must be resolved considering an existing contract, and Change Order process, with the voting system vendor which doesn't expire until June 30, 2012 that includes voting machine parts, and annual election management software maintenance and support. The work on upgrading the system requires the involvement of the Contractor, their sub-

contractor or any vendor authorized and experienced in configuring the network software consistently with the requirements and needs of the proprietary voting system software.

Contrary to the misperceptions often appearing in print media, the City Commissioners office, like any line Department under the Mayor, must procure all equipment, services and supplies through the City's Procurement Department. Issuance of any RFPs for professional services must undergo review by the City's Law Department.

First, the City has not had a contract to procure Cisco equipment for at least the past 16 years. Both the Law Department & City Procurement Department ruled out using 4 existing State contracts. The Commission intends to explore using the City's Small Purchase Order bidding system to procure the Cisco equipment by issuing a separate Small Purchase Order bid invitations for each type of network equipment required.

The second issue is obtaining qualified professionals services from a vendor licensed and authorized to configure the system using the voting system vendor's proprietary election management software. There are two possible options to obtain these services. The first would be to amend the existing voting system contract and the second would be to issue a new RFP for these services. Preliminary estimate of costs associated with the two options indicate that a new RFP process would provide substantial savings.

The City Commissioners website currently contains the necessary information required by voters to register to vote, locate their polling place and vote. Once the Commission's voting system infrastructure upgrade is completed, the system capacities substantially increased, and the web hosting moved in-house, the Commission can obtain the necessary resources to expand the information available on its website. However, if the Commission deems it more cost effective, or necessary to present registration and election information in a manner and content that provides uniformity across the Commonwealth will continue and increase the use of links to official websites of other government agencies, such as the Pennsylvania Department of State and US Election Assistance Commission.

SEVENTY:

At the very least, critical election information should be accessible on the city's website, where most voters would naturally look.

CCO RESPONSE: As stated at the beginning of this response – the Commission's registration and election information is readily available on the City's website. Again, The "ordinary user can find" the City Commissioners website in the same manner that the ordinary user finds other County / City Agency or City Department websites on the Internet – at the City's website: www.phila.gov.

The user simply needs to go to the City's homepage at www.phila.gov, click the **Find** link in the left hand column, move the cursor down to **Voter Information** and click again. The user will be taken to the City Commissioners website homepage at www.phillyelection.com.

When the voting system infrastructure is upgraded and the Commission's Web capabilities increased, the Commission will continue to be linked through the City's website as it has been.