



October 20, 2005

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U.S. Election Assistance Commission  
1225 New York Avenue, N.W. suite 1100  
Washington, D.C. 20005

**RE: Testimony to the Public Hearing on Voter Registration, submitted by David Rosenfeld and Adam Lioz, State Public Interest Research Groups (State PIRGs)**

Thank you for inviting the State PIRGs' New Voters Project to address the Commission and the topic of the timely return of voter registration applications by groups and organizations that conduct voter registration drives.

The State Public Interest Research Groups (PIRGs) – a network of state-based non- profit, non-partisan, public interest organizations with student chapters at 100 colleges and universities - have conducted volunteer-based youth voter registration drives for over 30 years. In 2004, the State PIRGs' New Voters Project conducted an ambitious youth voter registration drive that registered 524,000 18-30 year olds in 21 states.

From our experience, there are a few policies concerning the timely return of voter registration applications which can have a positive or negative effect upon volunteer voter registration drives.

I. Deadlines for submitting completed applications.

It is certainly appropriate to have a reasonable deadline for the return of completed voter registration applications. In managing our volunteer voter registration drives, the New Voters Project found it to be ideal to submit completed applications once a week. A deadline of less than 5 working days can become burdensome, particularly for volunteers who are not regularly able to get to a central office or other location. Having sufficient time to allow for an internal process of quality control is valuable.

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II. Penalties for failure to return completed applications.

We take very seriously the responsibility to return completed applications to election officials. Failure to return applications in a timely manner should result in a penalty, particularly in the case where the failure to return an application is a deliberate act. We believe that this matter of intent is an important distinction. There should be no tolerance of willful loss or destruction of completed voter registration applications. However, the problem would be that if penalties for failure to return applications in a timely manner were severe AND applied equally regardless of intent or circumstance, then the result would be to discourage well-intentioned volunteer voter registration efforts. Therefore, care should be taken to enact standards that do not chill legitimate registration efforts.

III. Tracking the group and/or individual third party collecting applications.

In order to enhance the ability of election officials, as well as organizations such as the New Voters Project, to determine responsibility for errors or problems with completed voter registration applications, and to increase the potential to correct any such errors, we prefer that there is a means of recording on the voter registration application the name and contact information for the third party (individual and group) who has collected a completed application. We also believe, so long as there are adequate supplies of voter registration applications, that voter registration forms that include a detachable receipt for the applicant (such as in California) are useful in ensuring the integrity of the process.

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