

cc's of CLS  
Julie  
5/20/08  
5/24/08

May 22, 2008



Mr. Tom Wilkey  
Executive Director  
U.S. Election Assistance Commission  
1225 New York Avenue, NW  
Suite 1100  
Washington, DC 20005

Dear Mr. Wilkey:

Please accept the comments of the Service Employees International Union (SEIU) on Commissioner Hunter's proposal to suspend EAC Advisory 07-003-A as to county and local governments. SEIU opposes this proposal because it will undermine election administration across the nation.

The purpose of maintenance of effort requirements is to ensure that federal funds increase the amount of state spending, rather than permitting the states to substitute federal grant funds for state funds. This proposal would permit states to evade that purpose by excluding county and local expenditures from the determination of baseline spending, despite the fact that a significant portion of the relevant expenses occur at the county or local level. Many states' HAVA plans have included the activities and expenditures of local and county government units, and these units have also received HAVA funding as a result. Excluding the spending by these entities under the proposed policy is likely to result in reduced overall expenditures for election administration. This policy threatens to burden local and county government units, who play a critical role in election administration, as well as constituting a serious disservice to voters.

SEIU is concerned that this proposal will undermine rather than advance effective election administration at a time when the need for more support and attention is critical. County and local governments are the front lines of election administration, and we urge you not to burden them by adopting this policy.

Thank you for receiving our comments and we ask that you transmit them to the members of the Commission.

Sincerely,

Anna Burger  
International Secretary-Treasurer

AB:AM:gmb

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