

Subject: Request for Written Approval of Supervised Electronic Signatures for LBC Petition

Dear Mr. Smith,

On behalf of **Eaglexit Action, Inc.**, I respectfully request written approval from the Department of Commerce, Community, and Economic Development to collect signatures electronically for the Eaglexit Local Boundary Commission petition through a supervised canvassing process.

Under the proposed system, an authorized canvasser would be physically present with the voter throughout the signing process. The voter would review the Department-approved petition materials and confirm or complete all information required by **3 AAC 110.415(a)(1)**, including the voter's:

- Name;
- Physical residence address;
- Numerical identifier;
- Signature; and
- Date of signature.

The voter would then sign electronically on a smart phone, tablet, or other approved device in the canvasser's presence. The canvasser would witness and certify the signing transaction.

We recognize that **AS 09.80.150(a)** gives each state governmental agency the authority to determine whether, and to what extent, it will accept electronic records and electronic signatures. We also recognize that **AS 09.80.150(c)** does not require an agency to permit electronic signatures. Accordingly, Eaglexit Action, Inc. will not circulate an electronic signature form or rely on electronically collected signatures unless the Department first provides affirmative written approval of the electronic form, signing method, security procedures, and submission format.

We therefore request that the Department determine whether it will approve a supervised electronic-signature process for this voter-initiated LBC petition.

Proposed safeguards

The proposed system would be designed to satisfy the security, integrity, confidentiality, preservation, and auditability considerations identified in **AS 09.80.150(b)**. Subject to Department direction, the system would include:

1. Use of an electronic version of the Department-approved petition signature form;
2. Physical presence of a trained and authorized canvasser during each signing;
3. Electronic entry of every item required by **3 AAC 110.415(a)(1)**;
4. A finger, stylus, or other Department-approved electronic signature method;
5. Every canvasser has their own individual profile, login details, and password;

6. A canvasser certification confirming that the voter personally completed and signed the record;
7. Verification that the signer is a registered voter residing within the affected area;
8. Automatic date and time stamping of each signature;
9. Identification of the canvasser and device associated with each transaction;
10. Encryption of all stored voter information, including signature files;
11. Restricted access to numerical identifiers and other information protected under **AS 15.07.195**;
12. A complete audit trail showing the creation, transmission, review, and preservation of each record;
13. Human review;
14. Secure backup, retention, and export of the electronic records; and
15. Submission of the records to the Department in the precise electronic or printed format required by the Department.

Requested determinations

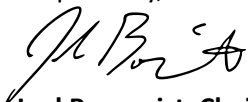
Before developing or using the electronic system, we respectfully request written guidance addressing the following:

1. Whether the Department will accept electronic signatures for a voter-initiated LBC petition under **AS 09.80.150**;
2. Whether a signature completed electronically in the physical presence of a canvasser may satisfy **3 AAC 110.415(a)(1)**;
3. Whether the Department will approve an electronic equivalent of its official petition signature form;
4. Whether the Department will accept this proposed process as presented and approve the collection of signatures using this method alongside the previously approved method.

We are prepared to provide the Department with a sample electronic form, system workflow, canvasser-certification language, and demonstration of the proposed application.

Thank you for considering this request. We welcome the opportunity to work collaboratively with the Department to determine whether a secure, supervised, and fully auditable electronic-signature process can satisfy Alaska's LBC petition requirements.

Respectfully,



Joel Borgquist, Chair

Eaglexit Action