



November 30, 2023

Dear Commissioners and staff:

On behalf of the League of Women Voters of Washington, I thank the PDC for providing this opportunity to comment on draft rules concerning grassroots lobbying activities.

As a volunteer lobbyist, I rely on League principles and positions that are adopted by our members through study and consensus, to determine how and when I speak for the League. Our position on representative government supports action to ensure the public's right to know, combat undue influence, and promote equitable participation in the election and initiative process.

The League supported the creation of the PDC with the passage of I-276 in 1972, and continues to support your work. We also supported the passage of HB 1317 as it improved timely disclosure of who is sponsoring and what was spent on mass communication directed to the public to influence legislation.

Our money in politics position emphasizes action to protect representative democracy from being distorted by big spending in campaigns. Equitable participation in political process requires careful consideration of the obstacles that may create unnecessary burdens or that require significant financial and administrative resources to understand compliance.

We are concerned that the proposed rules require so much data that it creates so much work for the regulated community and the PDC itself in providing and managing all of the data that it results in less access to useful information. Higher thresholds help ensure information is useful and does not unintentionally limit participation by those new to the political process with few monetary resources. For example purchasing a mailing list for \$100,000 is more useful information than \$3,500 in allocated office expenses and staff time. Harnessing technology to connect the L-2 and L-6 to streamline the reporting by sponsors, and providing training tools to make reporting straightforward and transparent for all are necessary for compliance and useful information.

Thank you for the engagement sessions as they were a good start on hearing from stakeholders. I look forward to contributing to future work groups on modernizing the reporting for grassroots lobbyists.

Best regards,

Cindy Madigan
League of Women Voters of Washington
Elections and Money In Politics Issue Chair
cmadigan@lwvwa.org