

Sasha Linker

From: Brelin Marshall <marshall@netfile.com>
Sent: Friday, October 14, 2022 4:15 PM
To: CommAsst
Subject: NetFile comments on the proposed amendment to Regulation 18410
Attachments: Comments for 18410 amendment.pdf

EXTERNAL EMAIL

Good day,

Please see the attached. If there are any questions for NetFile from the Commission or Commissioners about these comments I would be happy to address those or pass them along to others at NetFile to answer.

Thank you for your time.

Sincerely, Brelin

Brelin Marshall
Direct Phone: (916) 751-9133
Phone: (209) 742-4100
Fax: (209) 391-2200
Direct e-mail: marshall@netfile.com
www.netfile.com

The proposed amendments to existing Regulation 18410 that would add a requirement that all qualified committees disclose on Form 410 the names of at least three persons to authorized to obtain the financial records of the committee from the financial institute where the bank account is maintained would require a changes to the .CAL to support this requirement and would be based on these fields found in the CVR2 record of the current CAL e-filing specification:

----- Following variable fields used when Form_Type=[F400|F410] -----

04	Rx	Enty_Cd	3	Values: ATR - Assistant Treasurer (F410) POF - Principal Officer (F400, F410) CAO - Candidate/Office-holder (F410) PRO - Proponent (F410) SPO - Sponsor (F410) BNM - Ballot Measure's Name/Title (F410) ATH - Authorizing Individual (F400) COM - Committee (F400) CTL - Controlled Committee (F410) RCP - Recipient Committee (F400)
05	Rx	Enty_NamL	200	Filing Entity's Last name
06	C	Enty_NamF	45	Filing Entity's First name
07	O	Enty_NamT	10	Filing Entity's Prefix or Title
08	O	Enty_NamS	10	Filing Entity's Suffix
09	Rx	Item_Cd	3	Section of Stmt of Org this Itemization relates to Values: ATR - Assistant Treasurer (F410) POF - Principal {Filing} Officer (F400, F410) CTL - Controlled Committee Itemization (F410) PFC - Primarily Formed Commtte Item (F410) SPO - Sponsored Commtte Itemization (F410) SMA - Slate Mailer Authorizer (F400)

- 1) There would need to be a new version number for the .CAL specification ("2.5" perhaps) to let systems know the .CAL file should be evaluated differently than a current version 2.01 document
- 2) There would need to be new supported option for fields #4 and #9 to add a "Bank Records" officer type ("BNK")
- 3) The DISCLOSE service at SOS would need to allow the pass-through of the new version and new officer codes
- 4) The Cal-Online application would need to allow adding new officers of the BNK type
- 5) The Cal-Print subsystem would need to ignore the new officer type, so the publicly-viewable PDF's wouldn't have to be redacted
- 6) The daily data export of e-filing data that includes the CVR2 record output for Form 410 would need to intentionally omit officer records of the new "BNK" type

NetFile recommends the FPPC/SOS update the .CAL specification to match the description above (add a new lookup code to the CVR2 record) which can be automatically redacted from any printed representation of the 410 as needed and the .CAL specification should be updated.

Additionally, NetFile recommends that a solution to use text attachments to the e-file would not be desirable since automatic redaction would be prone to errors and the fact that text attachments are used for other information.

Lastly, local filing jurisdictions post courtesy copies of e-filed Form 410 originals and amendments for the benefit of their community, because of this any suggestion or recommended course of action by SOS for amended 410's that will be presumably e-filed to CAL-ACCESS should also be automatically redactable by local agencies.