## FPCA Federal Register Comments

ID Number	Comment
DOD-2013-OS-0061-0003	It will be an interesting tool.
	Form layout, flow and explanatory notes/instructions are fine. Suggest making all form fields
	fillable (enter the information online, then print filled form), except for the signatures. This
	will help ensure forms received are legible. Also, suggest the sentence, "See Voting
	Assistance Guide on FVAP.gov." contain an active hyperlink to the appropriate section of the
DOD-2013-OS-0061-0004	Voting Assistance Guide.
	The wording of the blanks for the Current Mailing address and the Voting Residency blocks
	could use more clarification. Perhaps a note on the Current Mailing address that says "(where
DOD-2013-OS-0061-0005	you reside now)" or something to that effect.
	As a spouse of an active duty soldier who has lived overseas I believe that this FPCA is good
DOD-2013-OS-0061-0006	and contains the requirements for the form to be filled out.
	Concerning the updated SF76 form.
	There is no place to request specific absentee ballots for state, county, city/township
	elections. Does the Supervisor of Election (SOE) at the county level know to send absentee
	ballots for all election annually?
	If possible it would be nice to have a feedback postcard to the requestor that would identify
	problems that prevent the SOE from processing the request. Like SF 76 Rev 10-95 had. As a
	UVAO I helped many service men/women solve the problems holding up their ballots
	because the member received the acknowledge receipt. I'm not advocating having the SOE
	send back a receipt for every request just a notice of problems.
	Very Respectfully
	CJ Coulombe, DAF
DOD-2013-OS-0061-0007	58 TRS/DOD/UVAO
	i need more in formation a bout election vote o ther e lection this is my first time for
DOD-2013-OS-0061-0008	registration let me know thank william.g

	1. The surveys sent after the election ask us to differentiate between overseas military and in
	US military, but these options are not given on the form under classification.
	2. There is no box for people to mark if they do not have SSN or DL
	3.One needs to submit a form to request ballots for each calendar year. Is there a way to have
DOD-2013-OS-0061-0009	it on the form somewhere?
	An active duty marine this was pretty simple to fill out because the instructions that was
DOD-2013-OS-0061-0010	enclosed with the form.
	I reviewed the form, and do not have any problems with it. Seems to be very simple and easy
DOD-2013-OS-0061-0011	to use. I would have no problems accurately completing it within 5 minutes if done
	As an Army VAO, I only noticed one thing that is really a petty aesthetic issue, but might as
	well be fixed before being officially published. The bottom line between the SSN field name
DOD-2013-OS-0061-0012	and the SSN entry block in Section 4 is not straight.
	FPCA documents need to have more white space for the signature block due to it being a
	signature document for verifying Absentee Voter's signatures. Due to the large amount of
	absentee ballots being returned by Military and Overseas Voters we and other counties in
	Florida are promoting the use of automatic signature recognition software. With the white
	space large enough 1/2" x 2 1/2" there should not be any "noise" of other fixed printing or the
	voter writing the date too close to the signature. This will aid in the manual or automated
	verification process of matching the voter record signature with the returned ballot envelope
DOD-2013-OS-0061-0013	signature. Thank you for accepting comments on this subject!

	Section 1: Classification
	We are often requested to provide statistics on overseas miltiary voters and military voters
	within the US. We are unable to provide this distinguish. It would be nice to add an option on
	this form.
	Section 8: Where to send my ballot
	The heading and description can be contradictory to each other. If a voter has requested a
	ballot by email or fax, the description asks them to provide their mailing address. It may be
	more useful to move the fax and email fields beneath the ballot receipt section and add a
	"Where to mail my ballot" field there as well. The "Where to send my ballot" field could then
	be renamed to "Address where I am currently located."
	Signature Line
	The line should be made longer so it is right-aligned with the rest of the form.
	Affirmation
DOD-2013-OS-0061-0014	The language is cramped. There's white space beneath to expand the spacing between each

	FPCA
	• Section 2. For the political party information, it would be helpful to emphasize the word
	"may", and also link to the state election office for clarification.
	• Instructions
	7. Says "For military voters the voting address is your legal U.S. residence." We suggest that
	it say "is usually your legal Check your State's pages in the Voting Assistance Guide
	on FVAP.gov."
	Both FPCA and FWAB
	• The following language appears on both the FPCA and FWAB: "I am a U.S. citizen and
	have never resided in the United States." In some states, people don't have to have ever
	resided there, but this is prohibited in MT based on current MCA language and the UMOVA
	language highlighted below. Due to the new language FVAP proposes, non-residents may
	argue that they have the right to register in MT, so we will at least need to clarify this in our
	state-specific instructions. To clarify, we suggest the following language be added either
	beside box 1, or on the back:
	"Some states allow U.S. citizens who have never resided in the United States to register and
	vote. Check your State's pages in the Voting Assistance Guide on FVAP.gov."
	UMOVA: [amendments incorporated] (6) "Overseas voter" means a United States citizen
	who resides outside the United States who would otherwise be qualified to vote in the last
	place in which the person was domiciled before leaving the United States.
	• Section 4. Identification
	o We would prefer State Driver's License or ID being listed before SSN.
DOD-2013-OS-0061-0015	Section 5. Contact Information
DOD-2013-OS-0061-0016	Recommend this form be a fillable one.
	I have been working on the Get Out The Vote (GOTV) project for several years and am quite
	familiar with the FPCA. This new version adds a "Classification" line for NGs and appears to
	open up (less boxes) the form so should be easier to read if hand written. I normally
	encourage and assist, if needed, people to fill out the form online as it is so much cleaner and
	usually guided, so less chance of errors.
DOD-2013-OS-0061-0017	The new form looks pretty good to me.

	Block 1. The "eligible spouse or dependent" option is one that also applies to an activated
	National Guard member (on line 2) in the District of Columbia (following passage of
	UMOVA).
	Block 7. Some of the District's street addresses may be difficult to write legibly in the space
	provided.
	Voter's Affirmation. The District of Columbia, among several other jurisdictions, passed
	legislation amending the mental capacity/competency eligibility criterion to be more narrow.
DOD-2013-OS-0061-0018	Currently, District residents affirm that they "have not been declared legally incompetent to
	Is this form intended only for overseas and military voters?
	1. Under classification, it would be helpful to include one more option: "I am a U.S. citizen
	living in the United States."
	Many states now offer no excuse Vote by Mail as a permanent option.
	2. Registrants should know that leaving the political party line blank indicates that they
	choose to NOT be affiliated with any party.
	7. If this is a universal voter affidavit then it should also ask for your current U.S. residence
	address.
	Affirmation.:
	the items "I am a U.S. citizen" and I am at least 18 years of age by the next election" and "I am
	not disqualified due to felony or mental incompetence"
	should be separated out from the affirmation and have boxes to check in front of them then
DOD-2013-OS-0061-0019	reiterate in the affirmation. Take the space from steps 8 and 9.

	Thank you so much for the opportunity to submit comments. All of the comments are based
	on the observation of iVoteIsrael staff which assisted 80,000 American expat to request their
	ballots from overseas.
	Box 1 -The top 3 options should be for non-military voters who often get confused and not
	sure what is being asked of them. The military will have no problem identifying their proper
	category.
	Box 3 - There should not be any option for filling out race. People get very offended by the request.
	Box 4 - The form should have all requests to input data lined up along the left column. Many
	people always leave out their birthdays because they don't see it, since it is located on the
	right side of the page.
	Box 6 - Change from ranking to asking the voter to fill out how many they want. Ranking
	leads to doubts as to whether the ballots will be received in the lower rankings
	Box 7 - County should be moved to the far right column (instead of the left). It should be
	bolded or made clear that the request is not for country. It may even be wise to state on the
	form (Not COUNTRY). Or, have as part of the address, pre-fill "Country USA which will
	also help voters to recognize which section is asking their old US address vs their current
	mailing address.
	Box 7 - Second half of zip code request causes only confusion. Just about nobody abroad
	knows the last 4 digits anyway
	Signature - The actual signature should be boxed - NOT the witness, which should be moved
DOD-2013-OS-0061-0020	far away from the signature box to avoid confusion
	As an Air Force IVAO, I polled the Unit Voting Assistance Officers on their opinions of the
	new forms - SF76, Federal Post Card Application; and SF186, Federal Write-In Absentee
	Ballot. They all liked the new format and thought it was much more legible. They liked the
	explanations in each block to help clarify the requirements. One comment was that without
	the separated letter boxes, it could also allow for sloppier handwriting. We assumed these
DOD-2013-OS-0061-0021	would all be filled in as pdf files, so that would take care of the handwriting issue.
	Provide a way for the applicant to designate if he/she wishes to receive all eligible ballots (i.e.
	local election ballots) - preferably a question with a yes/no answer, but a statement to check if
	"I want to receive an absentee ballot for all elections in which I am eligible to vote" would
DOD-2013-OS-0061-0022	also be helpful.
	· -

	I am a local election official. The form seems fairly straight forward except as noted below.
	There should be a general instruction that tells applicants that if filling the form by hand, that
	they MUST they should use block letters and numbers. Errors occur because it is often
	difficult to interpert what a person writes by hand.
	± ± • • • • • • • • • • • • • • • • • •
	Block 2: The language seems to vague. Change the language to read: "State your party
	affiliation if required by your state to vote in a primary election. See instructions for more information"
	Block 8: The info beside block 8 is not clear and a voter who is overseas often doesn't give us
	his/her overseas address. Suggest the language be changed to: The address where you
	currently live. It should be different than above. If you want your ballot mailed to a different
	address put that address in Block 9."
	Affirmation: it is difficult to read. Add some white space between the lines.
	Instructions for Block 8: As written, these create confusion. The address here must be the
DOD-2013-OS-0061-0023	address where the applicant currently lives. If they want their ballot mailed to another address
	The changes to Block 1 should increase the likelihood that the user will select the most
	appropriate classification while still providing election officials with necessary information.
	> The proposed description for National Guard members is more descriptive than the current
	language.
	> Prior language confused certain U.S. citizens who reside outside of the U.S. and whose
	return is certain but the "when" is unknown. The proposed use of "my return is not certain"
	should reduce the confusion and help users select the appropriate classification.
	The proposed form removes the alternate email address field. During the 2012 General
	Election, this office quickly learned that some military voters with a .mil email address did
	not receive our emails with information about accessing their ballots. We re-sent to their
	personal email addresses the same email, and each time, the voter received the second email.
	Having this second email address on file enabled us to respond more quickly, and I encourage
	the FVAP to keep the alternate email field.
	The parenthetical comment in Block 6 reminds the user to "be sure appropriate contact
DOD-2013-OS-0061-0024	information is provided above." Block 5 – where a user provides his or her email address or
	When drafting new FPCA application forms, please make sure you include:in the Contact
	Information an option that allows for an "Alternate E-Mail" address. Please increase the size
DOD-2013-OS-0061-0025	of the signature area to allow elections officials to scan and caputure signature image.

	Just one little detail: it would make the affirmation section a bit easier to read if each bulleted
DOD-2013-OS-0061-0026	item being affirmed started on a new line.
	It would make sense for both forms (FPCA and FWAB) to have the same required
	information fields organized in the same order.
	1) - In #8 - entitled "Where to send my voting materials" a change of title would be
	appropriate. The use of "The address where I currently live" or something similar might be
	more appropriate. The reason for this opinion is that if the voter does not furnish an address
	that is out of their current voting jurisdiction they are not eligible to be treated as a UOCAVA
	voter and therefore cannot be sent their ballot before E-29, nor can they be sent their ballot
DOD-2013-OS-0061-0027	electronically of by fax.
	In item 1, the "intend to return" versus "return is not certain" language is based on intent. But
	what about time frame. For example, what if the applicant intends to return in, say, 10 years?
	This may be irrelevant because the distinction really is meant to be by intent, only. But if this
	section is used to determine whether the applicant will be eligible to vote in state and local
	elections, then the time frame is relevant.
	Being an expat myself and knowing many of them, there are many who definitely intend to
	return to the US, but at some undefined time and maybe really never, but it is their
	psychological tie to the homeland that they never give up that intent and cannot set pen to
	paper to say (or admit to themselves) otherwise.
	On the other hand, this person has no ongoing tie to his/her voting state that would justify
	being able to vote in state or local elections unless the law specifically is meant to permit
DOD-2013-OS-0061-0028	state and local voting in this type of situation
	The boxes in sections 3, 4, 5, and 7 are small and difficult for someone to write in. Suggest
	removing boxes and just use lines.
	On the signature line, suggest removing "Print this form, sign, and send in" as it can interfere
DOD-2013-OS-0061-0029	with the clarity of the signture.
	Mailed comment. Classification does not require individuals to declare they are citizens. The
DOD-2013-OS-0061-0030	layout and flow is very good.
	Federal Post Card Application suggestions:
	-either enlarge boxes for name and address fields or replace with lines. the area is very small
	and difficult to read the information.
	-remove "print this form, sign" from the signature line. this scans over the actual signature
DOD-2013-OS-0061-0031	making it difficult to read the signature.

	1) Please increase the fillable-field area so font sizes can be increased. When voters fax the
	form, the writing is nearly illegible because it is too small. This is especially problematic if
	we must reach the voter and email addresses are illegible.
	2) Please make the instructions to #8 very clear that the mailing address must be
	DIFFERENT from residence address.
	3) the new categories in Box 1 are much clearer; good improvement.
	4) the email for ballot delivery should be within Box #6; if the voter wishes ballot to go to a
	different email address from a "contact email" in #5, then that could be specified in #6 (i.e. "if
	different from above").
	5) instructions for #5 on back of form should delete reference to plural email addresses - there
	is only one field for email.
	In general, it is confusing for voters re: which form to use. If instructions could be simplified
DOD-2013-OS-0061-0032	or made clearer who should use which form, that would be a great help.
	1. Classifications: good to include citizens not born in US. "Intent to return" language is
	unnecessary and unfair extra burden on overseas citizens. Americans are one of very few
	nationalities that take their duties (such as registering for Selective Service and filing tax
	returns) abroad with them, no matter where they are in the world. They should not have also
	to carry the burden of predicting their future actions to exercise one of their most important
	rights when no other class of citizens has to do so.
	2. Very great improvement in the language for sections 7 and 8.
	3. Instructions look good and are clear.
	4. Would be good to be able to fill out form online.
DOD-2013-OS-0061-0033	Mary Stewart Burgher, Chair, FAWCO Voting from Overseas Committee

	For consistency have the EDCA & EWAD forms require the come information and fallow the
	For consistency have the FPCA & FWAB forms require the same information and follow the
	same "block number" order.
	Any lines that a person would write on should be printed in light gray to help with contrast &
	readability.
	Emphasize FVAP.gov as a source for filling out the forms online. This will help with
	legibility of faxed documents, remove issues with interpreting handwriting and increase
	clarity of email addresses which have unique letters, numbers and symbols.
	Block 4 – Move "birth date" to the far left position, before "Sex", "Race".
	Block 5 – Under "Contact Information" add note that alternate email address can be put in
	Block 9.
	Block 6 – Change the wording underneath "I prefer" to: (mark your preference 1, 2, 3; be
	sure)
	Block 7 – Move "State & Zip Code" to far left, then "County", then pre-fill in "Country
	U.S.A."
	Block 8 – Under "Where to send by ballot", revise description to say "This is the address
DOD-2013-OS-0061-0034	where you live now. If needed, put forwarding address in Block 9."
DOD 2013 OD 0001 003 1	The Overseas Vote Foundation submission consists of the following 4 documents:
	The Overseas vote i oundation submission consists of the following 4 documents.
	1) Letter of introduction describing the overriding form redesign considerations that have
	guided our work
	2) Memorandum explaining our reasoning for a revised Classification section
	3) Proposed FPCA redesign – complete graphic implementation of design recommendations
	4) FPCA redesign rationale – graphic explanation/map of design recommendations
DOD-2013-OS-0061-0035	

The following comments are submitted on behalf of Placer County Office of Elections: FPCA Application Section 1: Classification •Although the voting requirements are mentioned in the Affirmation section located at the bottom of the page, they are not listed in the instructions or anywhere in section 1. Possible revision: Provide the voting requirements under the Classification heading or in the instructions for section 1. •In California, the voter's intent does not effect his/her ability to vote or the voting material issued. In addition, it is not a reportable item. Possible revision: Remove distinction and consolidate boxes three and four. Section 2: Political Party •The verbiage is passive. Possible revision: "My political preference is (required in some States)" Section 3: My legal name •The spacing is smaller between lines two (First name) and three (Previous name) making it more difficult to complete and review. Section 5: Contact information •The Alternative Email field is a very useful tool and frequently used to contact voters as a last resort. Recommendation: Reinstate the Alternative Email field. Section 8: Where to send my ballot •The heading is inaccurate. The address provided in this area used as a permanent mailing address. Possible revision: "Where to send my voting material" or simply "My current mailing address". •The verbiage under the heading is a little awkward. Possible modification to "This is your current mailing address (complete if different from residence address). FPCA Instructions-As non-citizens are rightfully permitted to serve in all branches of the U. S. military services, I suggest the same preface to each of the three Classification option sentences in Block 7, "I am a U.S. citizen." In my decades as an election official in a heavy military jurisdiction, I encountered instances of non-citizen active duty members attempting--quite unknowingly--to register to vote, especially when the person had an overly enthusiastic VAO who wanted 100% participation in his unit and didn't read all the fine print. This would save embarrassment and disappointment for the service member. DOD-2013-OS-0061-0037

	Full comment can be viewed at: http://www.regulations.gov/#!documentDetail;D=DOD-2013-OS-0061-0035. The Overseas Vote Foundation submission consists of the following 4 documents:
DOD-2013-OS-0061-0035	<ol> <li>Letter of introduction describing the overriding form redesign considerations that have guided our work</li> <li>Memorandum explaining our reasoning for a revised Classification section</li> <li>Proposed FPCA redesign – complete graphic implementation of design recommendations</li> <li>FPCA redesign rationale – graphic explanation/map of design recommendations</li> </ol>

	Full comment can be viewed at: http://www.regulations.gov/#!documentDetail;D=DOD-2013-
	OS-0061-0036The following comments are submitted on behalf of Placer County Office of
	Elections:
	FPCA Application
	Section 1: Classification
	•Although the voting requirements are mentioned in the Affirmation section located at the
	bottom of the page, they are not listed in the instructions or anywhere in section 1. Possible
	revision: Provide the voting requirements under the Classification heading or in the
	instructions for section 1.
	•In California, the voter's intent does not effect his/her ability to vote or the voting material
	issued. In addition, it is not a reportable item. Possible revision: Remove distinction and
	consolidate boxes three and four.
	Section 2: Political Party
	•The verbiage is passive. Possible revision: "My political preference is (required in some
	States)"
	Section 3: My legal name
	•The spacing is smaller between lines two (First name) and three (Previous name) making it
	more difficult to complete and review.
	Section 5: Contact information
	•The Alternative Email field is a very useful tool and frequently used to contact voters as a
	last resort. Recommendation: Reinstate the Alternative Email field.
	Section 8: Where to send my ballot
	•The heading is inaccurate. The address provided in this area used as a permanent mailing
	address. Possible revision: "Where to send my voting material" or simply "My current
	mailing address".
DOD-2013-OS-0061-0036	•The verbiage under the heading is a little awkward. Possible modification to "This is your
	As non-citizens are rightfully permitted to serve in all branches of the U. S. military services,
	I suggest the same preface to each of the three Classification option sentences in Block 7, "I
	am a U.S. citizen." In my decades as an election official in a heavy military jurisdiction, I
	encountered instances of non-citizen active duty members attemptingquite unknowinglyto
	register to vote, especially when the person had an overly enthusiastic VAO who wanted
	100% participation in his unit and didn't read all the fine print. This would save
DOD-2013-OS-0061-0037	embarrassment and disappointment for the service member.
DOD 2013 OB 0001 0031	emourtussment and disuppointment for the service member.

	Change the "Contact information" to number 7, the "Ballot receipt" to number 8, the "My
	Voting residence address" to number 5 and the "Where to send my ballot" to number 6 and
	move sections accordingly so that the "My Voting residence address" and the "Where to send
	my ballot" sections immediately follow the "Identification (4) section. This ordering is more
	in line with the voter registration data entry fields sequence order that is followed by most VR
	departments.
	Having the "Contact information" and the "Ballot receipt" shown as 7 and 8 is apropos to the
	entry process.
DOD-2013-OS-0061-0038	Lastly, BOLD the text at the top of the right-hand corner of the form "Please print in black

	FPCA application
	Comments:
	Wording on forms: I have had a number of extended discussions with voters as to the meaning of "do not intend to return" found in the earlier FPCA application. Wording on a form should clarify what is needed and why. By using the word "current" (see suggestions), it indicates to the voter that the information requested is what their current/present situation is and does not impact any future decisions or change of plans. The presently proposed wording for Classification 4th box of "and my return is not certain" does not clarify the voter's concerns. The wording "not certain" is open to interpretation.
	Statistical reports:  If you want statistics for military voters broken down by overseas and stateside you need to have a convenient box for the voter to check.
	Suggestions:
	Classification - 1st box (statistical reports)
	□I am a member of the Uniformed Services or Merchant Marine on active duty □Overseas □Stateside
DOD-2013-OS-0061-0039	☐I am an eligible spouse or dependent of a Uniformed Services or Merchant Marine on active duty ☐Overseas ☐Stateside

	Rearrange sections to be more in line with the voter registration (VR) data entry fields
	sequence order that is followed by most VR departments.
	Modify "Where to send my ballot" title to "Out-of-voting area or Overseas address". The
	reason for this change is that voters who want ELECTRONIC ballot delivery are misled with
	the "Where to send my ballot" section and fail to provide us with this qualifying "out-of-
	county" or "overseas" address presuming that the email or fax number is sufficient (e.g. email
	is where they want their voting materials to be sent). We NEED this "Out-of-voting area or
	Overseas address" to be provided by the UOCAVA voter in order to establish that the voter is
DOD-2013-OS-0061-0040	indeed qualified based on this address
202 2010 05 0001 0010	Comments provided by Orange County, California
	The format of proposed Form 76 looks cleaner and the use of lines is an improvement from
	using boxes to help people complete more clearly;
	The revised categories in box 1 are simpler and more inclusive; &
	The new format used in box 5 is preferred; however, we request that a field for alternate
	email address remain, as there have been instances when emails were bounced back to us but
	then deliverable to a second listed address.
	W. W
	One additional comment: Prior versions of the form presently used could be saved as a pdf;
	however, due to encryption, the current form cannot be saved in pdf format. The ability to
	save as a pdf was found beneficial as it provided the ability to email the form, as well as print
	the form for our mailer.
DOD-2013-OS-0061-0041	
	Full comment can be viewed at: http://www.regulations.gov/#!documentDetail;D=DOD-2013-
	OS-0061-0042. With this comment, I attach 3 files on behalf of CivicDesigning.org,
	Design for Democracy, and Oxide Design Co.:
	- A letter describing our comments and redesign considerations (CivicDesigning_Oxide-
	letter.pdf)
	- Report of a 2011 usability study of earlier versions of the FPCA and FWAB (FVAP-final-
	report-052011.pdf)
	- New recommended redesign of the FPCA. (Oxide_DFD-FPCA-Redesign.pdf)
	Please see the attachments.
DOD-2013-OS-0061-0042	We appreciate this opportunity to comment on the FPCA and FWAB.

	The following comment submitted on behalf of Los Angeles County Officeo Elections:
DOD-2013-OS-0061-0043	☐ On FPCA form instructions for box 5-9 add the email address FVAP.gov as listed in box 4.
	About the draft to a revised Federal Post Card Application (FPCA)
	1) Asking someone living abroad to predict if they will be returning seems unnecessary.
	4) It isn't just the SSN that might or might not be required. It is also (if you read all the way
	down through the instructions) "race". So the explanation in the first column should mention
	this. I.e.
	Check your State's pages in the Voting Assistance Guide on FVAP.gov to see if it requires
	Social Security Number and/or race.
	5) What is a DSN number.
	6) Show where to find info on what the State permits.
	9) The reference to Voting Assistance Guide should include the website address
	Re 4 & 6 & 9: A better strategy might be to give prominent mention to FVAP.gov Voting
DOD-2013-OS-0061-0044	Assistance Guide and use a symbol by each item that may require use of the guide in order to

These comments, some of which apply to both the Federal Post Card Application (FPCA) (SF 76)

and Federal Write In Absentee Ballot (FWAB) (SF 186), are respectfully submitted on behalf of

the Minnesota Office of the Secretary of State. This office in coordination with our local election officials process between 11,000 – 12,000 UOCAVA voters in a typical general election

cycle and responds to hundreds of inquiries from UOCAVA voters regarding the process and completion of these forms.

Our comments are primarily technical in nature and do not necessarily address the lay out of the forms. However, we do believe that if some of these comments are incorporated into the next design, the improved flow of the form would decrease the need for additional communication between voters and election officials.

## Classification:

We believe that both statements related to U.S. citizens overseas are confusing. Some states, including Minnesota, allow voters who reside in the United States but are temporarily visiting another country to avail themselves of this alternative absentee process. As such, it would be helpful if the word "residing" was deleted from the first statement. In addition, it would be helpful if the statement clarifies that the voter knows not only that they intend to return someday, but that their date of return is fairly set. Both of these changes could be accommodated if the statement read, "I am a U.S. citizen outside of the U.S., and I know approximately when I intend to return."

The language in the other statement "my return is not certain" is confusing as well. It could instead be phrased, "I am a U.S. citizen residing outside the U.S., and I do not know when or

DOD-2013-OS-0061-0045

I am submitting a comment in support of previous comments submitted by Overseas Vote Foundation (DOD-2013-OS-0061-0035) and CivicDesigning.org (DOD-2013-OS-0061-0042) regarding our collectively proposed redesign of the FPCA.

In support of our recommendations:

The visual design and language of our redesigned FPCA are based on the U.S. Election Assistance Commission's "Effective Designs for the Management of Federal Elections", along with our significant experience in information design. The EAC's best practice recommendations are based on what worked best in usability testing. The current form in use comes close, but is missing a variety of design and plain language nuances that would make it much easier to use.

The current versions of the FPCA and FWAB have not been adequately tested with actual voters. After working with Dana Chisnell / CivicDesigning.org and the Overseas Vote Foundation in an attempt to reach an authoritative recommendation, it's clear that usability testing with the right voters would clarify the problems of having two vastly different audiences (military and civilian) with very different issues and priorities.

Based on my recent experiences with designing for people with low literacy and cognitive issues while developing the Anywhere Ballot, I can attest that plain language and simple, clear design work better for everyone. Again, without testing, we're just making educated guesses on what the very best solution will be. But we feel that our redesigned version of the form would be a great start towards making the form more universally usable.

Thank you for your consideration of this submission.

Sincerely,

DOD-2013-OS-0061-0046

	Form
	• Instruction to print in black ink at top needs to be larger and more prominent.
	Block 1: Classification
	Clarify options related to intent:
	Eliminate option not certain and clarify options three and four using checkboxes:
	I am a U.S. citizen residing outside the U.S., and I
	intend to return to the U.S. □ yes □ no
	maintain a residence in the U.S. □ yes □ no
	,
	Block 2: Political Party
	o Add comment underneath words "Political Party" such as "see instructions for
	clarification" or "Check your state's requirements in the Voting Assistance Guide on
	FVAP.gov." Virginia receives many questions from voters on this matter.
	1 1 2 1 1 3 1 1 1 1 1 1 1 1 1 1 1 1 1 1
	Block 4: Identification
	o Eliminate the "OR" and list the few states requiring full SSN in left margin, E.g., "VA,
	require full SSN to register."
	require run sort to register.
	Block 5: Contact information
	o Make this like FWAB #5 to include alternate email; revise both to place email ahead of
	fax. The following order is easier to read:
	☐ Telephone
	□ Email
	□ Fax
	☐ Alternate email
DOD-2013-OS-0061-0047	- Attendit Chan
DOD-2013-OS-0001-00 <del>1</del> /	

n
"VA,
,
ead of

	Terra and
	FPCA:
	- In box 8, change instructions to read "This is your current mailing address and could be
	different from above. " This
	would accommodate military stateside voters who have the ballot mailed to the same place as
	their voting residence
	address.
	- Keep the language below the signature line "Print, sign and send in," as it currently reads.
	Otherwise, voters may think that by simply filling out the form and including a digital
	signature, they have submitted the form.
	- Highlight the word "gray" in the two instances it is used in the opening statement of the
	FPCA so that it conforms to the opening statement on the FWAB.
DOD-2013-OS-0061-0049	of the residence of the opening statement on the residence
202 2013 05 0001 00 17	We are pleased to see a real improvement in response to well-documented problems with the
	phrase, "I do not intend to return." The Classification sections of the FPCA and the FWAB
	now contain the less intimidating option, "I am a U.S. citizen residing outside the U.S., and
	my return is not certain."
	We appreciate this change, although our preference is still to return to the language from
	2005, which read, "I am a U.S. citizen residing outside of the U.S. indefinitely." We
	understand that there are reasons for a shift to language that requires U.S. citizens living
	abroad to forecast their future living arrangements, but we maintain that the deterrent effect
	of that language should be given more weight.
	Similarly, some voters living abroad were disturbed by the form's use of a separate category
	for citizens who have never resided in the United States. We understand that this may be
	necessary due to state laws.
	Still, we must convey the complaint we hear most often from U.S. citizens who want to vote.
	Time and again, we find that overseas U.S. citizens, in response to Classification questions,
DOD-2013-OS-0061-0050	ask, "Why do they want that information?" Too often, the official reason does not inspire

Thank you for the opportunity to comment on these two forms. Given the similarity in the information presented in the two forms, this submission to your Federal Register Notice combines our comments on both the Federal Post Card Application (FPCA) and the Federal Write-in Absentee Ballot (FWAB). National Defense Committee's comments and recommendations are organized by theme, given the similarity in the two forms and the information it requests. Online FPCA and FWAB Tools: The 2011 FPCA had specific language in the upper right hand corner, "A quicker, easier to complete, electronic version of this form is also available on FVAP.gov." National Defense Committee believes driving UOCAVA voters to use the online FPCA and FWAB tools is quicker, easier, produces far fewer errors than completing forms by hand. Therefore, National Defense Committee recommends this language be used in any future versions of the FPCA and FWAB. Digital Signature/Secure PDF: The Public Key Infrastructure (PKI) embedded in Department of Defense issued Common Access Cards (CACs) provides a robust digital signature capability. Such digital signatures provide strong evidence of personal identity, authentication, verification, and non refutability. They can also be

coupled with visual representations of the individual's hand signature, embedded in the same

DOD-2013-OS-0061-0051

	Please amend the Overseas Vote Foundation comment number: 1jx-8515-ngsj submission.
	1. The footnote found on page 4 of the document titled: "(2_of_4)_OVF_Memo-
	Classification-Reasoning_DOD-2013-OS-0061-0001.pdf" was incomplete. The complete
	footnote is as follows:
	[1] Blount v. Boston, 718 A.2d 1111, 1115 (M.D. 1998) ("The two most significant objective
	factors evidencing a person's intent regarding domicile are where the person lives and where
	he or she votes or is registered to vote."); Comptroller of the Treasury v. Lenderking, 303
	A.2d 402, 405 (Md. 1973) ("Evidence that a person registered or voted is admissible and
	ordinarily persuasive when the question of domicile is at issue.").
	2. Please replace the document titled: (3_of_4)_OVF_FPCA_Redesign_DOD-2013-OS-0061-
	0001.pdf
	with the new document titled: Amended_(3_of_4)_OVF_FPCA_Redesign_DOD-2013-OS-
	0061-0001.pdf
DOD-2013-OS-0061-0052	This new version specifies "Race" as optional. Otherwise, the two documents are identical.