

by **Conner Edwards** on **Tue, 25 Feb at 6:17 AM** via **Email**

Written Comment for February PDC Meeting

External Email

Commissioners:

This e-mail is my public comment for this Thursday's meeting.

1. Missing Info From Agenda. Earlier this week, PDC staff uploaded a draft agenda of Thursday's meeting to the agency's website. This draft agenda does not include any meaningful information relating to the discussion and possible decisions that will be made as part of the campaign reporting & compliance project (scheduled for 11:00 AM on the agenda).

When members of the public have no detail about what is being presented or discussed at a PDC meeting, they are hamstrung when it comes to providing meaningful public comment.

In the past, the PDC has uploaded non-privileged meeting materials (such as staff memos) to the agency's website so that members of the public have an opportunity to meaningfully interact with the agency through written comment. The PDC should resume this practice.

2. New Agency Policy to Reduce Backlog. There are two possible interpretations of the PDC's new policy (discussed at January's meeting) authorizing staff to dismiss an even greater portion of substantiated complaints.

The first interpretation is that this policy is intended to free up limited agency resources in the short term so that the PDC can reinvest those resources into implementing proactive policies which can dramatically reduce the instances of noncompliance that frequently leads to complaints.

The second interpretation is that this policy is intended to throw a rug over a significant problem regarding noncompliance within the agency's regulated community. With staff now able to effectively ignore complaints that substantiate allegations of high rates of noncompliance amongst filers, the agency has very little meaningful incentive to try to improve the functionality of the overall regulatory regime with new proactive approaches.

Actions speak louder than words. This is especially the case at the PDC where discussions about meaningful changes often lead to repeated postponements and eventually amnesia. Hopefully, over the next few months, the agency will show that it is the first interpretation which is accurate and not the second.

If meaningful change is going to occur, it will have to be prompted by the Commissioners. The impetus for change will not come from agency staff. The agency's most recent successful project (creating automatic notifications for late/non-filed C4 reports) would not have occurred if Commissioners Jarrett, Hayward, and Isserlis had not insisted on changes.

3. Legislative Issues/Reporting Calendar. A bipartisan coalition of campaign treasurers have recently supported and promoted passage of HB 1782, which would increase the amount of time treasurers have to file C4 reports from 24 to 48 hours. This is a policy that has been part of PDC agency request legislation for the last two legislative sessions. Nonpartisan legislative staff have described the bill and the arguments for and against the bill here:

<https://lawfilesexternal.wa.gov/biennium/2025-26/Pdf/Bill%20Reports/House/1782%20HBR%20SGOV%2025.pdf?q=20250225055615>

In a stunning last-minute turnabout, PDC staff have now come out as opposed to this policy. Fortunately, a strong bipartisan coalition of lawmakers have decided to advance the bill over the objections of PDC staff.

Coming up with changes to simplify the reporting calendar is a great idea. But that may very well take years to effectively stakeholder and implement. In the meantime, campaigns and campaign treasurers should not have to deal with the current unreasonable turnarounds of the existing reporting calendar.

There is no legitimate reason for the PDC to oppose a policy which has been the product of such extensive bipartisan stakeholder work. There is plenty of room for compromise on this bill. However, the confrontational position adopted by agency staff is not appropriate or beneficial to anyone.

Best,

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