

I like the improvements to the Reporting Schedule Proposal, but I think more can be done:

- 0) To respond to the other commentator Edwards: I don't understand his concern around switching tracks and raising money "above" a threshold. From my understanding of the proposal, there is no financial threshold between the two tracks, just whether a campaign is "participating" or not, and the proposal ensures that all (non-mini) campaigns regardless of activity are reporting at least once a month. All campaigns must report either way even if there is no activity. And presumably it is easy to track a campaign is on by looking at C-1 over time.
- 1) That said, there is an existing two track model that is based on financial thresholds, mini and full reporting, which is confusing. Since we already have a two track system, which is mini reporting and full reporting based off of fundraising amounts, it might be confusing to overlay that with a second two track system, so instead I might suggest a three track system:

Track 1: Mini Reporting	No Reporting this year, agrees to extremely limited fundraising AND extremely limited spending this year
Track 2: Full Reporting Non-Participating	Less Frequent Reporting this year, regular fundraising limits this year
Track 3: Full Reporting Participating	More Frequent Reporting this year, regular fundraising limits this year

Under all three tracks, there is definitive reporting (or not reporting), none of the current "do not report until you have something to report" that we are trying to solve. And the track status would be extremely prominent on the C-1.

Candidates: by default are automatically slotted into Track 2 or Track 3 based on C-1 registration of when the election is, unless in January the Candidate proactively declares into Track 1 and agrees to follow all mini-reporting rules. Can only switch from 1 to 2/3 based on existing rules around switching to and from mini and full reporting.
PACs: by default are reset into Track 3 every January, unless the PAC in January declares into Track 1 or 2 per C-1. If Track 1, must agree to follow all mini reporting rules, and procedures to switch to Full Reporting.

(Today, Mini Reporting already kicks campaigns into Full reporting if there was a failure to file for mini reporting in January)

I think it would be fine, per Edwards' comment, to a rule saying that PAC must stay in Track 3 all year, or can do a one-time jump to Track 3 from 2 if they decide to "get off the bench and participate" for the rest of the year, though that might be painful for a campaign that is only participating in an April Special election. Otherwise, January can be annual C-1 registration month where campaigns can declare which Reporting Track they agree to follow for the year (and will comply with the rules of that track): (1, 2, 3, 4?, 5: special election only?) I imagine the law can be written to allow PDC to administratively create multiple reporting tracks with different reporting requirements that campaigns must self-select into. Seems like a very flexible way to do things.

- 2) I also suggest making the reporting date for Full Reporting Non-Participating different (track 1 in the official revised proposal, track 2 in my alternative), either:
 - a. Make them due on the 15th or 20th of the month, allowing treasurers to focus the first ten days of the month on Participating Campaigns, which would be of interest to the public. This does not reduce public transparency since right now many Non-Participating Campaigns are likely to file “no activity” reports, reports with minimal activity, and this is a net gain from today with indeterminate filing dates.
 - b. Better yet, make them due once a quarter, like many states do. Again, does not reduce transparency since there is a definitive due date, which is still a net gain from today where there are indeterminate due dates. And would make more the most sense if a campaign is likely going to report bank interest, bank fees, and maybe minor expenses like a PO Box or Website Fees.
- 3) Next, I would suggest a commitment from PDC to make it easy to file “no activity” reports “en masse” in ORCA and in any other treasurer software, such as a “multi-select” functionality or “select all” button to file for many campaigns in one single motion, otherwise it becomes very painful to many idle campaigns one at a time (imagine the drudgery), and, more importantly to also make it easy for a treasurer to switch many campaigns to mini-reporting every January “en masse”
 - a. Letting idle campaigns switch to mini reporting every January can be an easy “relief valve” for those campaigns that might have minor expenses like bank fees or PO Box or website fees, and minor income like bank interest, by committing to raising no more than \$7K this year and spending no more than \$7K this year.
 - b. Alternatively, perhaps there should be some mechanism for “no activity” reports to exempt minor things like bank fees or bank interest, like “no activity above \$x dollars.”
 - c. Again, imagine the drudgery of having to deal with many idle campaigns. How can we balance the drudgery on treasurers (and expense on campaigns) for minimal public benefit? En Masse filing is going to help a lot.
- 4) Finally, I agree with Edwards’ that we can customize the reporting dates for Full Reporting Participating campaigns, retaining additional C-4 reports on certain “day marks” when valuable, instead of a blanket “twice a month during campaign season.”