Common Cause
Rhode Island
Holding Power Accountable

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VIA ELECTRONIC MAIL

May 28, 2025

Rob Rock
Department of State
82 Smith St.
State House - Room 218
Providence, RI 02903

Dear Mr. Rock:

I am writing on behalf of Common Cause Rhode Island to oppose the proposed change to 100-RICR-20-00-3, regulations that establish the procedures for the issuance of voter ID cards.

The proposed change would eliminate the language in 100-RICR-20-00-3.3(D) that allows a voter who does not possess one of the enumerated forms of identification to submit a Voter ID Application, and for the Department of State to issue a Voter ID Card if the signature on the application matches the signature in the central voter registration system.

While it is our understanding that this option has been rarely used since the implementation of these regulations, we believe it remains an important failsafe for a voter who otherwise does not possess other forms of identification.

As you know, our election system uses a voter's signature for a variety of other purposes including voter registration, mail ballot applications, and mail ballot qualification. The Elections Division of the Department of State has significant experience in matching signatures as a result. We believe that using a signature is an appropriate method of verifying identity for purposes of our Voter ID law as well.

Furthermore, we are not aware of anything in the record that necessitates this proposed change to the regulation. If there is evidence that this option is being abused in some way that might justify eliminating it, we might take a different position on this issue.

We urge the Department of State to preserve the language in 100-RICR-20-00-3.3(D) and provide voters a variety of options for acquiring a Voter ID.

Sincerely,

John Marion
Executive Director