## RE: Commission invites comment on proposed permanent rules

<u>Chad Magendanz</u> reported 16 days ago (Tue, 4 Sep at 11:52 PM) via Email To: pdc@pdc.wa.gov

It seems that many minor technical changes have been proposed to <u>WAC 390-18</u>, which are very much inline with ESHB 2938 intent to simplify compliance "without sacrificing transparency and the public's right to know who funds political campaigns." I would suggest eliminating another "gotcha" that seems counterintuitive and which I see often violated.

It's common practice these days to replace campaign buttons and name badges with stickers. These are typically the same size as buttons and badges, are also worn on the shirt or label, and can be printed in lots of 4,000 for only \$76...about 30 times cheaper than buttons. While the underlying RCW considers it impractical to include the sponsor's full name and address on items "such as campaign buttons", the WAC breaks these items down differently. Frankly, whether the information is affixed via magnetic backing, safety pin, or adhesive doesn't seem particularly relevant to the legislative intent, so many campaigns are surprised to learn that there are maximum dimensions in the WAC for stickers and that they're so small.

In fact, none of the online print shops I've found even offer stickers sized that small, and 2-3/4" x 1" is a very unusual dimension. It's really only used for mailing address labels, which aren't really suitable as campaign stickers. The smallest custom cut-to-size sticker I can order online is 1.5" x 2.5".

My suggestion is to just <u>eliminate the maximum size on stickers</u>, so that it's consistent with campaign buttons, name badges and all the other campaign swag.

Really, I was surprised to find out that all campaign stickers weren't exempt, and then shocked to find out that the maximum size was so impractically small. Let's make Sponsor ID compliance for stickers much simpler, more consistent, and intuitive.

- Chad