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New England **First Amendment** Coalition

Protecting First Amendment Freedoms and the Public's Right to Know

111 Milk Street, Westborough MA 01581 | 508.983.6006 | nefac.org



January 22, 2024

Via first class mail and email: Thomas.Kehr@sos.nh.gov

**Thomas Kehr, Right to Know Ombudsman
State of New Hampshire
129 Pleasant St,
Concord, NH 03301**

Re: Ombudsman's Draft Final Proposal Rules RKO 100, 200 and 300

Dear Ombudsman Kehr:

On behalf of the New England First Amendment Coalition, a non-profit organization dedicated to promoting First Amendment rights and governmental transparency and accountability, I hereby submit this letter to address concerns regarding the proposed rules referenced above. I do commend you on the thoroughness of those proposed rules.

Our first concern relates to proposed rule Rko 203.06(b), as it does not contain the language contained in Rko 203.07, allowing for electronic filing, i.e. "unless an electronic system has been instituted pursuant to described in Rko 203.02 (b) so as to allow for electronic submissions..." We believe that the electronic filing language should also be inserted as a sub-paragraph (4) to Rko 208.01(a).

Thank you for the ability to submit these suggestions to the proposed rules. We trust that in implementing the final rules you will comply with the mandates of disclosure contained in Part I Article 8 of the New Hampshire Constitution and in N.H. RSA 91-A.

Respectfully submitted,



Gregory V. Sullivan, President

xc: Justin Silverman, Executive Director

Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances.

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