



August 20, 2021

**VIA E-mail to Commission Assistant to Chair, California Fair Political Practices
Commission: CommAsst@fppc.ca.gov**

Chair Miadich and Commissioners Baker, Cardenas, Hatch, Wilson, and Wood
1102 Q Street, Suite 3000
Sacramento, CA 95811

RE: Digital Transparency Task Force Report and Recommendations

Dear Chair Miadich and Commissioners:

The League of Women Voters of California writes in strong support of the Digital Transparency Task Force Report and Recommendations. We believe that these recommendations will improve transparency in digital political advertising. We offer congratulations and gratitude to everyone involved, with special recognition of the excellent work of your staff.

Based on our own experience directly providing digital voter information in multiple languages, and our experience contributing to many state voter information design processes, we offer you this advice to clarify how critical design is in the recommendations:

1. **Recommendation 2, Contents of the Archive, #4 considerations, c. Community review (page 19).** We recommend both the archive and the disclosures be included in a formal, professional, community centered design process. We strongly suggest "community review" should be interpreted to mean "community centered design process" when implementing these recommendations.
2. **Recommendation 3, Request Digital Disclosure Research (pages 20-21).** We highlight for you that this section cites the success of holding a community centered design process to inform the implementation of [SB 505 \(Mendoza 2015\)](#) Voter Bill of Rights. We also focus your attention on the importance of this sentence:

"To ensure transparency, the research process should include public hearings to identify the scope of the study, discuss the methodology, materials, and questions prior to the start, and disclose the data and draft report prior to finalization."

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We strongly suggest the “study with public engagement” recommended on page 21 should be interpreted to mean a “community centered design process” when implementing these recommendations.

3. Further, we wish to stress that qualitative iteration does not find a final right answer, but rather evolves over time, adjusting to new conditions. Design should be conducted periodically by trained experts in the community centered design discipline and who are subject to an Institutional Review Board. We urge great care in selecting these community centered design experts. They need to be able to explain and champion community centered design at public hearings. They must be able to speak to transparency and accountability concerns while protecting the professional process. In particular, they will need to explain how a small, iterative study serves as guidance for all of California.

We highly recommend the community centered design process. Detailed design choices are best left out of legislation. Instead, they should be refined again and again by experts in community centered design to suit the needs of the times.

Thank you for championing these important reforms.

Sincerely,



Carol Moon Goldberg
President