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**Public Comment - Feb. 13 FPPC Meeting - Agenda Item 9**

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**From** David Carnahan <DCarnahan@sunnyvale.ca.gov>

**Date** Sat 2/8/2025 7:41 AM

**To** CommAsst <CommAsst@fppc.ca.gov>

**Cc** David Carnahan <DCarnahan@sunnyvale.ca.gov>

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## **EXTERNAL EMAIL**

Hello Chair Silver, Vice Chair Baker and Commissioners,

I am not able to attend your February 13 meeting due to a conflict with a Sunnyvale City Council Workshop but would like to share some appreciation and requests with you regarding continued implementation of AB1170.

### **Appreciation for Improved Automated Notifications**

As a local filing officer, receiving emailed notice that an G.C. 87200 filer from Sunnyvale has completed a Form 700 in eDisclosure is much appreciated. These automated emails have become more helpful as they now include the non-redacted and redacted versions of the filed Form 700 as attachments. Sunnyvale has elected to upload these Form 700's to its local agency's e-filing system. This helps members of the public locate these forms as they are accustomed to visiting Sunnyvale's [Statement of Economic Interests \(SEI\) Form 700 Public Portal](#) to find all Form 700's associated with City of Sunnyvale elected officials and staff.

### **Request 1 – Reverse Data Exchange Functionality**

For agencies such as Sunnyvale that maintain an e-filing system, I request the FPPC continue to explore or develop “reverse data exchange” functionality. A reverse data exchange would facilitate Form 700's filed by G.C. 87200 filers automatically flowing from the FPPC's eDisclosure system to a local agency's e-filing system. Automating the transfer of Form 700's from eDisclosure to a local agency's system would ensure filings are available in the local agency's system promptly during evenings, weekends and holidays while also reducing staff workload for the local agency. I understand some local agencies do not intend to upload G.C. 87200 filings to their local systems, with this in mind, a reverse data exchange system should include an option for a local agency to opt-out of the reverse data exchange.

### **Request 2 – Include all eDisclosure filed Form 700's on DisclosureDocs**

All Form 700's filed in the eDisclosure system should be accessible via the FPPC's [DisclosureDocs Portal](#). The practice of excluding G.C. 87200 appointed official Form 700's such as City Manager, City Attorney and Finance Director from this portal is a step back for transparency. If a local agency does not elect to upload eDisclosure filed Form

700's for G.C. 87200 appointed official to their local filing system or website, the public must email the FPPC to request a copy of the filed form. Not only does this delay the public's ability to view certain Form 700's but FPPC staff are required to spend time locating and producing these requested Form 700's. Including all Form 700's filed in the eDisclosure on the FPPC's DisclosureDocs Portal would improve transparency and free up some amount of staff time for other FPPC work.

Thank you for your consideration of this appreciation and requests as you review regulation changes in response to AB1170.



**DAVID CARNAHAN, MPA, MMC** (Pronouns:

he/his/him)

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