



May 28, 2021

Submitted via www.regulations.gov

Department of Defense
Office of the Secretary

Comments by American Citizens Abroad, Inc. on Suggested Updates to Federal Post Card Application (FPCA) (Docket ID DoD-2021-OS-0018)

Americans Citizens Abroad, Inc. (ACA), a Washington, DC based qualified section 501(c)(4) non-profit, non-partisan membership organization representing the estimated 8 to 9 million Americans living abroad respectfully submits comments on the proposed updates to the FPCA form.

1. There is no indication of which responses are obligatory/mandatory/required. ACA assumes local election boards make the decision as to whether additional information is needed when the form is incomplete. But if states could agree on a core set of data elements which (to-be-developed) best practices deem absolutely necessary, it would be good to designate the absence of those data elements as presumptively fatal to the application, to save time and increase certainty.

2. The phrase "I am not registering, requesting a ballot, or voting in any other jurisdiction in the United States, except the jurisdiction cited in this voting form" makes no sense.

If you imagine the states as letters in the alphabet, and the voting state as a letter chosen from this alphabet, the current text essentially says, "I am not choosing any letter from B to Z, except A".

They no doubt mean the following, which is ACA's suggested replacement text: "I am not registering, requesting a ballot, or voting in any United States jurisdiction other than the jurisdiction cited in this voting form."

Respectfully submitted,

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