



VIA EMAIL

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Chair, Secure Elections
America First Policy Institute

Dale Kennedy
Director
Product Classification
United States Postal Service
475 L'Enfant Plaza SW, Room 4446
Washington, D.C., 20260-5015

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RE: Proposed rule amending the *Mailing Standards of the United States Postal Service*, Domestic Mail Manual (DMM) regarding the transmission of mail-in or absentee ballots for federal elections through the mail

Mr. Kennedy:

Please see the comments below from the America First Policy Institute (AFPI) regarding the proposed rule amending the *Mailing Standards of the United States Postal Service*, Domestic Mail Manual (DMM), regarding the transmission of mail-in or absentee ballots for federal elections through the mail. This proposed rule, if enacted, would partially implement Executive Order 14399, *Ensuring Citizenship Verification and Integrity in Federal Elections*. This proposed rule strengthens chain-of-custody for mail-in ballots and improves processes for securing ballots. The America First Policy Institute appreciates the opportunity to comment on the United States Postal Service's (USPS's) proposed rule.

Introduction

Mail-in ballots have become a regular mechanism by which Americans make their voices heard in an election. Over the past few decades, rates of mail-in ballots have steadily increased, from under 10% in 1996 to over 30% in recent elections (with a temporary pandemic spike over 40% in 2020).¹ Given that such a large subset of the American people choose to cast their ballots by mail, it is critical that the government entity tasked with ballot chain-of-custody from voter to election office has proper safeguards in place. Without these safeguards, it is nearly

¹ Note: Data from ([MIT Election Data + Science Lab, n.d.](#)).





impossible to have absolute assurance that the will of the people is accurately transmitted into electoral outcomes.

Mail-In Ballot Vulnerabilities

Currently, multiple vulnerabilities in mail-in ballots could be remediated under this proposed rule. First, ballot envelope design is inconsistent across the 10,000+ jurisdictions that conduct federal elections.² Some ballot envelopes are automation-compatible and some are not, leading to very different mechanisms of processing across jurisdictions. Some jurisdictions make election mail very clear, but in others, that identification is not as easy. Second, many jurisdictions mail ballots with no unique identifier linking the specific envelope to that specific voter. This can result in a ballot being lost, delayed, or misdirected with no way to detect it until the voter realizes—if the voter even realizes. Third, there is no federal-level mechanism for comparing the total ballots mailed to the total number returned. Discrepancies like the ones that the America First Policy Institute highlighted can occur with limited recourse to reconcile.³

The Proposed Rule Offers Real Solutions

This proposed rule introduces meaningful safeguards against vulnerabilities intrinsic to mail-in ballots. The use of the official Election Mail logo, automation-compatible envelope design, and uniquely serialized Intelligent Mail barcodes are all already outlined as best practices in USPS's own Election Mail Kit 600 guide.⁴ This proposed rule ensures that all jurisdictions and all election administrators participating in federal elections adhere to the same baseline standard, rather than allowing discretionary adoption at the choice of the election administrator.

The requirement for uniquely serialized Intelligent Mail barcodes on both outbound and return ballot envelopes poses a clear benefit to voters. These barcodes allow ballots to be tracked as they move during the chain-of-custody process, giving election officials real-time information about the status of the ballot. Voters are also able to confirm that their ballot was received. The barcodes make it much more difficult to lose, delay, or fabricate a paper trail. Post-election audits depend on accurate election data. A barcode on every ballot showing its path from the voter's hand to the election office is a huge step in data accuracy.

The provision for the creation of a mail-in and absentee participation list is also a meaningful solution to the issue of ballot tally reconciliation. It allows states to retain full control while providing them with a useful tool. The USPS is not determining voter eligibility. The list of mail-in and absentee voters creates a reconcilable record of how many ballots were mailed vs. how

² Note: Data from ([National Conference of State Legislatures, 2026](#)).

³ Note: Data from ([America First Policy Institute, 2022](#)).

⁴ Note: Data from ([USPS, 2026](#)).





many were returned, which can then be compared to state data. The more checks and balances are introduced into data reconciliation, the more accurate the result will be.

Finally, this proposed rule improves internal USPS operations. Automation-compatible ballot envelopes will reduce manual handling and processing errors. The Election Mail logo will help postal workers quickly identify and prioritize ballots over regular mail. Standardizing envelope design and making election mail clearly recognizable will simplify the training that postal employees handling election mail receive. These are all great improvements and help the American people to trust that their ballots are in good hands.

Conclusion

This proposed rule is reasonable, practical, and impactful, introducing a sound framework to bring federal election mail up to speed with the capabilities of the 21st century. In a world where anyone can swipe a credit card and receive instant confirmation, it's important that election mail is subjected to the best possible processes, encouraging accountability and transparency at every step of the way. The proposed rule's core provisions are the kind of commonsense safeguards that I have supported in my extensive career in election security policy. As the former Secretary of State in Ohio, I have run elections and handled mail-in ballots, chain-of-custody, and audit procedures. This proposed rule addresses real vulnerabilities in the current system while preserving state control of elections and partially implementing Executive Order 14399, which seeks to protect American elections. Voters in our country deserve to know that their ballots are counted as cast. This proposed rule moves voters closer to that reality.

The Hon. J. Kenneth Blackwell

CHAIR, SECURE ELECTIONS

The America First Policy Institute

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