

Friday, October 10, 2025

Commission on State Mandates  
980 9<sup>th</sup> Street, Suite 300  
Sacramento, CA 95814

**RE: Internet Websites and Email Addresses. 24-TC-04.**

Dear Chair Stephenshaw and Members of the Commission on State Mandates,

The California State Association of Counties (CSAC) submits this comment letter regarding the draft proposed decision for Santa Clara County's test claim submitted for Chapter 586, Statutes of 2023, ([Assembly Bill 1637](#), Irwin). The primary purpose of CSAC is to represent county government before the California Legislature, California administrative agencies, and the federal government. This includes advocating on the value and need for county programs and services and for adequate funding to provide those services. CSAC submits this letter in accordance with the Commission's September 19, 2025 "Draft Proposed Decision, Schedule for Comments, and Notice of Hearing" which states that written comments may be submitted until 5:00pm on Friday, October 10, 2025. CSAC wishes to provide the subsequent comments for the Commission's consideration of the draft proposed decision for this test claim.

### **Governing in Modern Society**

CSAC agrees with the Commission staff's finding that local agencies are practically compelled to comply with the requirements of the test claim statute. Counties and cities maintain websites and email addresses for their staff in the interest of most appropriately and efficiently providing services and information to California residents. We wish to express our gratitude to the Commission's staff for their thoughtful and comprehensive exploration of this matter and their consideration of the complexity and increased public expectations of modern governance.

### **Preserve Flexibility to Reach Compliance**

CSAC agrees with the findings by the Legislature cited in the draft proposed decision via a variety of exhibits that there will be great diversity in how each local agency acts to comply with the test claim statute. The variables that cause wide differences in the most efficient means of compliance are copious, including the size of population that the local agency serves, their budgetary constraints, the infrastructure and complexity of their existing information technology systems, the size and skill level of existing information technology staff, and more. CSAC encourages the Commission to embrace these variations as necessary

to accommodate the great diversity and unique needs of California's local governments, and not to regard this common occurrence as "discrepancies."<sup>1</sup>

### **Applicability of AB 1637 to Web Applications**

CSAC requests that the draft proposed decision be amended to acknowledge that web applications share the same ubiquity as websites and email addresses. The dynamic and interactive content of web applications allow county and city governments to provide a modern and efficient level of service to their residents, as described above. From the perspective of a typical California resident with average knowledge of information technology, a web application appears to be a sophisticated website with interactive components that allow them to perform specific tasks, such as secure electronic payments, online portals for permitting and licensing, online portals for submission of Public Records Act requests, and more.

To further illustrate the pervasiveness of web applications in the fabric of government technology, the California Department of Technology maintains [web templates](#) that serve as "a digital standard and tactical playbook on delivering useful, accessible, and performant user experiences."<sup>2</sup> The Department's web templates include frameworks for server-side web applications as part of four "essential" state template files.<sup>3</sup> The California Department of Technology describes the need for and importance of their web templates because "digitally connecting Californians to the government services they need has become increasingly more critical."<sup>4</sup>

Notably, the draft proposed decision states that "Cities and counties use their public websites to easily disseminate information and provide other government services, and members of the public have become reliant on using these websites."<sup>5</sup> The draft proposed decision follows this statement with examples of such government services the public is reliant on, as cited in the test claim. Some of the critical government services listed therein may be deployed as web applications by cities and counties to better serve the public, similar to the services listed in the previous text of this letter.

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<sup>1</sup> Draft Proposed Decision, Schedule for Comments, and Notice of Hearing *Internet Websites and Email Addresses*, 24-TC-04, Page 15.

<sup>2</sup> State of California Web Template "About" Webpage <https://template.webstandards.ca.gov/about.html>

<sup>3</sup> State of California Web Template Download and Setup Webpage <https://template.webstandards.ca.gov/download-and-setup.html>

<sup>4</sup> State of California Web Template "About" Webpage <https://template.webstandards.ca.gov/about.html>

<sup>5</sup> Draft Proposed Decision, Schedule for Comments, and Notice of Hearing *Internet Websites and Email Addresses*, 24-TC-04, Page 34.

Finally, the draft proposed decision states that “The test claim statute’s plain language makes no mention of ‘web applications’ being required to use the specified domain names.”<sup>6</sup> However, the test claim statute does not include mention of the word “webpage” yet it is clear that webpages are similarly affected by the requirements of the test claim statute as they are subcomponents of websites. The web applications in question are accessible through a URL address and are maintained by the county for use by the public. Therefore, for the average person, web applications are indistinguishable from websites, and they exist for the efficient and modern delivery of county services. For these reasons web applications should be similarly considered to websites wherein the draft proposed decision states that local agencies are “practically compelled to comply with the test claim statute by migrating their websites to a domain name using either “.gov” or “.ca.gov” by January 1, 2029, even for websites they are not legally compelled to maintain.”<sup>7</sup>

Thank you for your consideration of our comments, and we look forward to continuing this conversation as 24-TC-04 moves through the Commission’s process.

Respectfully submitted,



Eric Lawyer  
Senior Legislative Advocate, CSAC

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<sup>6</sup> Draft Proposed Decision, Schedule for Comments, and Notice of Hearing *Internet Websites and Email Addresses*, 24-TC-04, Page 38.

<sup>7</sup> Draft Proposed Decision, Schedule for Comments, and Notice of Hearing *Internet Websites and Email Addresses*, 24-TC-04, Page 33.