



**SPOKANE MUNICIPAL COURT**  
PUBLIC SAFETY BUILDING  
1100 W. MALLON  
SPOKANE, WASHINGTON 99260  
(509) 622-5867

**MICHELLE SZAMBELAN**  
PRESIDING JUDGE

January 22, 2015

The Honorable Barbara A. Madsen  
Chief Justice, Washington State Supreme Court  
Washington State Supreme Court  
PO Box 40929  
Olympia, WA 98504-0929

**Sent via email to [supreme@courts.wa.gov](mailto:supreme@courts.wa.gov)**

**Re: JISC Rule 13 – Electronic Court Records Systems**

Dear Chief Justice Madsen:

On behalf of the Spokane Municipal Court, I am writing to express opposition to the passage of Judicial Information System Committee Rule 13 Concerning Local Court Systems (JISCR 13). Until further analysis has been completed outlining the impacts of this rule to our justice system, I am requesting the Supreme Court not pass this rule at this time. Spokane Municipal Court, Seattle Municipal Court, King County District, and King County Superior Court have each previously expressed our concerns related to JISCR 13. Although it is not my intent to reiterate our collective concerns here, I would like to express the following additional issues Spokane Municipal Court with the proposed JISCR 13.

**Regarding JISCR 13 Section (a)**, we appreciate that this rule provides a clear definition for electronic court records and we do not have objections to this provision.

**Regarding JISCR 13 Section (b)**, we propose the following change: *"All electronic court record systems must receive the approval of the Judicial Information System Committee. Notice of the proposed development must be provided to the Judicial Information System Committee and the Administrative Office of the Courts in advance of the commencement of such projects, for the purpose of understanding the court's intent in moving to a non-JIS system and to ensure that a court's solution will provide necessary information to JIS and Washington Courts."*

The Spokane Municipal Court believes that the AOC's role should be limited to the review of the court's requirements to ensure that the JIS Data Standards will be met and to understand where there may be gaps in the provision of data so that solutions can be pursued.

**Regarding JISCR 13 Section (c)**, we believe this section should be modified and rewritten. The requirements of this section as currently written is not reasonably achievable by courts of limited jurisdiction. The AOC itself has indicated that it is not currently capable of meeting the JIS Data Standards; nor is it clear if the Superior Court's CMS application – Tyler's Odyssey application -- will meet these Data Standards. AOC also recognizes that the JIS Data Standards will change over time, yet there is nothing in this provision that protects courts that may be using an alternative electronic court record system from having to incur increased costs by AOC-led changes to the Data Standards.

**Regarding addition of a JISCR 13 Section (d)**, we believe the new section needs to be added to the rule that specifically directs the AOC, in concert with its promulgation of the JIS Data Standards for Alternative Electronic Court Records System, to develop, implement, and maintain a data/document exchange and synchronization interface between any future AOC developed and/or operated electronic court records system and all alternative electronic court records systems. This interface should use relational database formats and computer software industry-standard tools, programming language, and methods, as an *initial* element of AOC's development and implementation of the JIS Data Standards for Alternative Electronic Court Records System. Further, the interface is so important that AOC should be required to include such interface in any RFP for the initial development of the anticipated replacement of its current electronic court records system.

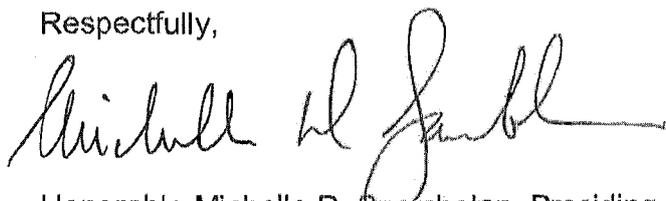
In sum, JISCR 13 as proposed has far reaching implications for Washington State Courts. As written, it attempts to exercise more control over municipal court technology decisions than what we believe the Legislature intended in its most recent proviso. Adopting this Rule without addressing the concerns expressed by the Spokane Municipal Court and other courts, which have found it necessary to seek advanced case and document-management solutions to meet their courts' business requirements -- despite several attempts to work with the AOC on potential solutions, will continue to Balkanize courts and AOC.

The accelerated adoption of the JIS Data Standards and JISCR 13 is problematic, especially since the rule includes language from a Legislative Proviso that was limited to Superior Courts. More time should be allowed in order to develop a proposed rule that is acceptable to all courts.

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I am requesting a two month delay in considering JISCR 13 in order to allow interested courts to work with the AOC and JISC in drafting a rule that will be more reasonable and attainable for all courts.

Respectfully,

A handwritten signature in cursive script, appearing to read "Michelle D. Szambelan". The signature is written in black ink and is positioned above the typed name.

Honorable Michelle D. Szambelan, Presiding Judge  
Spokane Municipal Court

cc: SMC Judges, Commissioners, & Court Administrator

## Tracy, Mary

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**From:** OFFICE RECEPTIONIST, CLERK  
**Sent:** Thursday, January 22, 2015 2:19 PM  
**To:** Tracy, Mary  
**Subject:** FW: Letter to J. Madsen re: JISC Rule 13  
**Attachments:** Madsen JISC Rule 13 Letter.pdf

I opened this and it is a rule letter. If you need to, you can forward it on to Julie.

*Kris Triboulet*

Receptionist/Secretary

Washington State Supreme Court

[Kristine.triboulet@courts.wa.gov](mailto:Kristine.triboulet@courts.wa.gov)

360-357-2077

**From:** Szambelan, Shelley [mailto:SSzambelan@spokanecity.org]  
**Sent:** Thursday, January 22, 2015 2:08 PM  
**To:** OFFICE RECEPTIONIST, CLERK  
**Cc:** Delaney, Howard; Fulkerson, Margie  
**Subject:** Letter to J. Madsen re: JISC Rule 13