

HB

266

SENATE COMMITTEE REPORT

FURTHER Judiciary

1/18/88

DATE TURNED INTO OFFICE _____

Mr. President:

Resources _____ Committee considered CSHB 266 (RES)
recording of documents

and recommended

[] replace with _____ CS _____) [] same title
[] or adopt _____ CS _____) [] new title

[] attached amendment(s) and

[] do pass

[] do not pass

[] no recommendation

[] individual recommendations

[] further referral to _____

[] letter of intent adopted _____

Committee [] attached or [] adopted fiscal note(s)
[] new [] updated or [] previous
[] zero [] fiscal impact

MEMBERS SIGNING DO PASS

OTHER RECOMMENDATIONS

[Signature]
Artur Sturgulewski

[Signature]
Forsing Notes

[Signature] DO PASS
Chairman signature and recommendation

[] Committee Backup attached

FISCAL NOTE

REQUEST:

Revision Date: 4/19/88 Agency Affected: DNR
 Title: An Act relating to the BRU: Management & Administration
recording of documents
 Sponsor: Rep. Ulmer Components: Information Resources
 Requestor: Senate Resources Management

EXPENDITURES/REVENUES: (Thousands of Dollars)

OPERATING	FY 88	FY 89	FY 90	FY 91	FY 92	FY 93
PERSONAL SERVICES						
TRAVEL						
CONTRACTUAL						
SUPPLIES						
EQUIPMENT						
LAND & STRUCTURES						
GRANTS, CLAIMS						
MISCELLANEOUS						
TOTAL OPERATING	-0-	-0-	-0-	-0-	-0-	-0-
CAPITAL						
REVENUE						

FUNDING: (Thousands of Dollars)

GENERAL FUND						
FEDERAL FUNDS						
OTHER						
TOTAL	-0-	-0-	-0-	-0-	-0-	-0-

POSITIONS:

FULL-TIME						
PART-TIME						
TEMPORARY						

ANALYSIS : (Attach a separate page if necessary)

Clarifies certain procedures for recording of documents by the State Recording Offices. Requires that regulations be no more restrictive than the statutes unless they further a legitimate administrative need.

Prepared by: Sharon Barton Phone: 465-2406
 Division: Division of Management Date: 4/19/88

Approved by Commissioner Judith M. Brady Date: 4/19/88
 Agency: Department of Natural Resources

Distribution (by preparer):
 Legislative Finance
 Legislative Sponsor
 Requestor
 Office of Management and Budget
 Impacted Agency(ies)

STATE OF ALASKA
THE LEGISLATURE

POUCH Y - STATE CAPITOL
JUNEAU, ALASKA 99811
907-465-3800

LEGISLATIVE AFFAIRS AGENCY

MEMORANDUM

January 25, 1988

SUBJECT: Comparison of SB 304 and CSHB 266 (Resources)

TO: Senator Jack Coghill, Chairman
Senate Resources Committee

FROM: Theresa L. Bannister *TLB*
Legislative Counsel

You have requested that I provide the Senate Resources Committee with a comparison between SB 304 and CSHB 266 (Resources) ("HB 266"), two bills dealing with the recording of documents. As a preliminary matter, note that this comparison should not be considered an authoritative interpretation of the bills and the bills themselves are the best statements of their contents.

In general, SB 304 contains a major revision of the state recording system while HB 266 addresses only two subjects on state recording, which are

- (1) the recorder's decision on whether the document is to be recorded (sec. 2 of HB 266); and
- (2) the adoption of regulations on recording (sec. 3 of HB 266).

Section 1 of HB 266 makes certain legislative findings for the bill. SB 304 does not contain findings.

Section 2 of HB 266 gives specific directions to the recorder for reviewing a document for recording. SB 304 directs the recorder to promptly record all documents presented which are recordable under certain sections (see Sec. 40.17.070(a)).

Sec. 34.15.343(1) prohibits the recorder from considering whether the document's contents are legally sufficient for the purpose of the document. SB 304 does not address this specific subject.

Senator Jack Coghill, Chairman
Senate Resources Committee
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January 25, 1988

Sec. 34.15.343(2) directs the recorder to resolve any reasonable doubts about the document's eligibility for recording in favor of recording the document. SB 304 does not address this specific subject.

Sec. 34.15.343(3) prohibits the recorder from rejecting a document in certain listed situations.

Sec. 34.15.343(3)(A) prohibits the recorder from rejecting a document that met the requirements for recording when the document was executed. Sec. 40.17.060 (in sec. 1 of SB 304) provides nearly the same protection, except that SB 304 limits its application to certain listed documents.

Sec. 34.15.343(3)(B) prohibits the recorder from rejecting a document that serves more than one purpose. SB 304 does not address this issue.

Sec. 34.15.343(3)(C) prohibits the recorder from rejecting a document that does not state the name of the recording district, if the information is either given to the recorder when the document is offered for recording or contained in a cover letter accompanying the document. SB 304 requires that a document be accompanied by or include the information required by department regulations (Sec. 40.17.030(4)).

Sec. 34.15.343(3)(D) prohibits the recorder from rejecting a document that references an attached exhibit that is not labelled. SB 304 requires that a document be accompanied by or include the information required by department regulations (Sec. 40.17.030(4)).

Sec. 34.15.343(3)(E) prohibits the recorder from rejecting a document that is a certified copy of an official document from a governmental office in this or another state. SB 304 allows certified or otherwise verified copies of specific types of documents (e.g., judgments) to be recorded as Class A documents, but does not contain a general reference to all official governmental documents.

Section 3 of HB 266 prohibits a regulation from imposing a restriction on document recording unless the restriction is required by statute or furthers a legitimate administrative

Senator Jack Coghill, Chairman
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need. SB 304 requires that the regulations be consistent with the new law.

If I may be of further assistance, please advise.

TLB:gc
WKG1:048

Alaska State Legislature

Committees:

Chair-State Affairs
V. Chair-Judiciary
Telecommunications
Special Ethics
Legislative Council
Finance Subcommittee
for the University of Alaska
Joint Committee
on Economic Recovery



P.O. Box V
Juneau, Alaska 99801
(907) 465-4947

REPRESENTATIVE FRAN ULMER

M E M O R A N D U M

April 19, 1988

TO: Senator Jack Coghill, Chairman
and Members of the Senate Resources Committee

FROM: Representative Fran Ulmer

SUBJECT: House Bill 266

I introduced House Bill 266, "An Act relating to the recording of documents", to bring consistency to the policies governing what documents should be recorded by the Recording Offices throughout the State of Alaska. House Bill 266 has received widespread support from the Alaska Miners Association, title companies and attorneys.

Section 1 is a statement of facts explaining the underlying purpose of the bill.

Section 2 adds a new section to AS 34.15 outlining recording criteria. When determining whether a document may be recorded, the recorder could not consider whether the contents of the document are legally sufficient to achieve the purposes of the document. Reasonable doubts would be resolved in favor of recording.

The bill also sets forth several instances when a document may not be rejected.

The recorder could not require that a document which serves more than one purpose be recorded separately for each of the purposes. This would not prevent the multiple recording of a document if the person requests that it be recorded for more than one purpose.

Finally, in Section 3, the bill amends AS 44.37.025 so that a regulation of the department could not impose a restriction on document recording unless the restriction is required by statute, or furthers a legitimate administrative need of the recorder.

Thank you for your support of HB 266.

District 4B — Juneau



ALASKA MINERS ASSOCIATION, INC.

501 W. Northern Lights Blvd., Suite 203, Anchorage, AK 99503 (907) 276-0347

April 17, 1987

RECEIVED APR 23 1987

Honorable Fran Ulmer
Alaska State Legislature
P.O. Box V (MS 3100)
Juneau, Alaska 99811

Re: House Bill No. 266

Dear Rep. Ulmer:

The Alaska Miners Association supports House Bill No. 266 and its passage this session of the legislature.

Since the majority of mining operations in Alaska are conducted by "small miners", in remote and unsurveyed areas of the state, and since the penalty for failure to timely file or record documents relating to mining claims can be loss of the claims, it is imperative that procedural or technical niceties do not preclude their recordation, as long as the intent of the documents is fairly stated.

We believe that House Bill No. 266 goes a long way toward accomplishing those objectives, and congratulate you for introducing that bill.

Sincerely,

ALASKA MINERS ASSOCIATION

Curt McVee
Curtis V. McVee
Executive Director

TIA TITLE
INSURANCE
AGENCY

Main Office
201 N. Franklin St.
Juneau, AK 99801
(907) 586-6445

Valley Branch
9110 Glacier Hwy.
Juneau, AK 99801
(907) 789-1671

April 17, 1987

Representative Fran Ulmer
Pouch V
Juneau, AK 99811

Dear Fran:

Your introduction of House Bill 266 is commendable. This type of legislation is long overdue.

The recording system has been kind of a step child for as long as I can remember, being administered according to the whims of various departments it has been in. It's encouraging to see an attempt to stabilize the system.

Sincerely,



Glen A. Prince
Executive Vice President

GAP:bjk

RECEIVED APR 21 1987

RECEIVED
RECEIVED APR 6 1987

DORIS LOENNIG
A PROFESSIONAL CORPORATION
ATTORNEY AT LAW

SUITE 120, 515 SEVENTH AVENUE - FAIRBANKS, ALASKA 99701
907 452-2005

April 1, 1987
(Dictated 3-31-87)

Representative Fran Ulmer
P.O. Box V
Juneau, Alaska 99811

Dear Mrs. Ulmer:

I received a memorandum March 9, 1987 from members of the Natural Resources and Real Estate Sections of the Alaska Bar Association asking me to review a proposed amendment to the Recording Act. I apologize for not responding more promptly, but I do want to advise you that I am strongly in favor of the amendment.

As is so often the case as governmental bodies develop, there is a tendency to draft laws and regulations that benefit the bureaucrats while not particularly serving the public. The Recorder's Office has become extremely stringent in what they will accept for recording with the result that vital documents are being denied recording. For instance, I am involved in a situation where a Deed necessary to the chain of title was damaged by flood water. It is readable, but the Recorder's Office will not record it because the microfilm record would not be readable. The solution would be to type an exact copy of the deed, certify it as a copy of the original and then record both the original and the certified copy. By the Recorder's Office refusal to record the document, there is a break in the chain of title which will require an expensive suit to quiet title.

Also, recently I had a very difficult time getting a certified copy of an Alaska State Patent recorded. The original Patent had not been

Mrs. Fran Ulmer
Re: Recording of Documents

April 1, 1987
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recorded when issued, and had been lost. The present owner of the property was required to convey a marketable, insurable title, which he could not do without completing the chain of title by the recording of the Alaska State Patent. There should never have been raised any objection to the recording of the certified copy.

Very truly yours,

DORIS LOENNIG, P.C.

By: 

DORIS LOENNIG

DL:dcm

RECEIVED MAR 11 1987

HUGHES THORSNESS GANTZ POWELL & BRUNDIN

ATTORNEYS AT LAW

DAVID H. THORSNESS
JAMES M. POWELL
BRIAN J. BRUNDIN
MARCUS R. CLARK*
KENNETH R. JACOBUS
GARY W. GANTZ
JERRY E. MELCHER
JOE M. HIDDLESTON
SIGURD E. MURPHY
CARL J. O. BAUMAN
FRED B. ARVIDSON
DENNIS M. BUMP*
MARY K. HUGHES
FRANK A. PPIFFNER
RALPH R. BEISTLINE*

GORDON J. TANS
R. CRAIG HESSER
ROBERT L. MANLEY
JAMES M. GORSKI
TIMOTHY R. BYRNES
JAMES M. SEEDORF
RONALD E. NOEL*
FREDERICK J. OUSEN
MICHAEL L. LESSMEIER**
STEVEN S. TERVOOPEN
MATTHEW K. PETERSON
JOSEPH R. O. LOESCHER
KENNETH O. LOUGE*
EARL M. SUTHERLAND
JOHN B. THORSNESS

GREGORY W. LESSMEIER**
JOHN V. ACOSTA*
DONNA R. WALKER**
WILLIAM M. WALKER***
DANIEL M. WOLD
DAVID S. CARTER
MARILYN MAY
JOHN G. FRANK**
ANN S. BROWN*
BRIAN D. BJORKQUIST
JAMES N. BARRELEY
THOMAS R. LUCAS
TIMOTHY R. REDFORD
SHELDON E. WINTERS**
JOHN J. NOVAK

JOHN M. TINIALI
DAVID M. RYAN
MICKALE C. CANTER
MATTHEW G. FAYNOLD
BRYAN M. EMMA*
ROBERT A. SPARKS*
JOSEPH S. SLUSSER*
JAMES F. KLASSEN

OF COUNSEL
JOHN C. HUGHES
RICHARD O. GANTZ

508 WEST THIRD AVENUE
ANCHORAGE, ALASKA 99501-2273
TELEPHONE (907) 274-7522
TELECOPIER (907) 274-7523
TELEX 090-26378 (DENALI)

ONE SEALASKA PLAZA
SUITE 303
JUNEAU, ALASKA 99801-1148
TELEPHONE (907) 588-5912
TELECOPIER (907) 463-3020

190 UNIVERSITY AVENUE
SUITE 200
FAIRBANKS, ALASKA 99708-3692
TELEPHONE (907) 470-3181

200 CHENEGA STREET
P.O. BOX 767
VALDEZ, ALASKA 99688-0767
TELEPHONE (907) 835-2888

March 10, 1987

REPLY TO ANCHORAGE

Honorable Fran Ulmer
State Representative
P. O. Box V
Juneau, Alaska 99811

Dear Representative Ulmer:

I received the enclosed memorandum from the Alaska Bar Association, as I am a member of the Natural Resources Section Executive Committee of the Bar Association.

I support the language of the attached (proposed) House Bill, "An Act relating to the recording of documents", in its entirety. I wholeheartedly support the bill and the reasoning behind it. I urge you to introduce it, and not by request.

If for no other reason, I object to the current recording regulations and support the proposed bill on the grounds that the Department of Natural Resources has no business placing unreasonable and cumbersome limitations on the public's right to record documents. If it is to be done at all, it should be done by the legislature through elected representatives and not subject the right to record documents to the discretionary, often petty and whimsical "legal" interpretations of clerks. I have personally had the experience of the Fairbanks Recording Office (initially) refusing to record documents that are required by federal mining claim regulations to be recorded with the recording district; only after strenuous argument (the clerks adjourned to a private conference on the matter while I waited an hour) was the document accepted. If the documents had not been recorded, my clients' mining claims could have been declared invalid by the United States Bureau of Land Management.

Most of my practice consists of representing small miners. As a group, these people are bright, but have little formal education; they are literally overwhelmed by the legal and regulatory climate in which they are struggling to survive. As a user group, I would wager that miners use Alaska's recording

Honorable Fran Ulmer
March 10, 1987
Page 2

offices more than any other single group of people. They do so for a very good reason: they must annually file documents with recording offices to preserve their possessory rights, upon pain of losing the claims to rival claimants or the government.

Unlike persons wishing to record documents who are seeking to place themselves prior in time to the interest of another party, the failure to timely record a document for a miner does not simply place that miner's interest in a position subordinate to someone who has filed ahead of him. Instead, the failure to timely file various mining documents can, and usually does, result in a total loss of the miner's rights--e.g., by an administrative declaration from BLM to the fictional effect that their claims have been "abandoned". This abandonment penalty has been sustained as lawful by the United States Supreme Court recently and BLM may take such action, despite abundant evidence that the miner did not intend to abandon the claim.

As a group, miners stand to lose more than any other group under these current recording regulations, because miners typically wait until near the annual deadlines to file their documents. At that time, should a clerk narrowly or adversely interpret any one of the host of regulatory obstacles to recording with which DNR is now armed, it will be too late for the miner to correct the situation; in many instances, the miner will simply lose his rights. Often, the failure to record cannot be cured by filing another mining claim location certificate, because the ground upon which the claim was located is now in one of Alaska's many national parks or other areas now closed to mineral entry.

Long before there were recorder's offices, there were mining districts. Each mining district (many of which were established shortly after acquisition of Alaska from Russia) had a district recorder, whose job was almost exclusively to accept mining claim recordings. It is sad and ironic that State of Alaska recorder's offices, which succeeded to the duties of mining district recorders, now seek to limit the public's right to record.

Finally, I will conclude by suggesting that some teeth be placed in the bill proposed; otherwise, even though the intention of the legislation is clear, it could still be frustrated, without penalty, by State employees. You are probably aware of the fact that some Alaska statutes provide for penalties to be assessed against an employee who violates the statute. For example, I believe there is a statutory prohibition against Department of Revenue employees divulging confidential information about taxpayers; penalties are provided for releasing the information. I can say from personal experience that this penalty provision is

Honorable Fran Ulmer
March 10, 1987
Page 3

terribly effective, because I have sought to obtain seemingly unrelated and harmless information and the Attorney General's Office has always advised the employee to err on the side of caution by refusing to release it. The fear of this penalty is so great that I have even had cases wherein the Attorney General gave this same advice, even though the information was requested pursuant to a lawfully issued subpoena (I was able to obtain the information, but only after persuading the taxpayer to authorize its release).

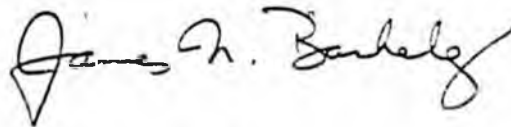
Thus, assuming a reasonable definition of "wrongful refusal to record" could be arrived at, I respectfully submit that penalties should be provided for under those circumstances--which penalties should include all losses proximately caused by the wrongful refusal--e.g., the loss of mining claims or other valuable property rights.

This is not a matter involving a particularly crusty, obstructionist clerk in one recording district; this is a matter of paramount importance and is of state-wide concern.

One last note: my opinions in this letter are conveyed to you from me as an individual, and they do not necessarily constitute the opinions of the Alaska Bar Association nor of Hughes, Thorsness, Gantz, Powell & Brundin.

Very truly yours,

HUGHES, THORSNESS, GANTZ,
POWELL & BRUNDIN



By:
James N. Barkeley

JNB/mt
2793i

cc: Linda Nordstrand, Alaska Bar Association
CLE Director

DOUGLAS L. GREGG, Esq.

PROFESSIONAL CORPORATION

ATTORNEY-AT-LAW

130 SEWARD STREET, SUITE 417

JUNEAU, ALASKA 99801

March 4, 1987

Honorable Fran Ulmer
Representative District 4B
State House of Representatives
P.O. Box V
Juneau, Alaska 99811

Re: Amendments to Recording Statute AS 34.15
My File G-1579

Dear Representative Ulmer:

Thank you for having our bill drafted. It seems to cover all the bases. I am not certain my schedule will allow me to attend Friday's bar luncheon. As a committee member I certainly hope that you will get a bill in as quickly as possible. I keep hearing horror stories. Fred Baxter is currently having a problem getting a certified copy of a court order from Anchorage recorded down here. The reason for refusal: "It is not an original." Can you believe this?

Very truly yours,

DOUGLAS L. GREGG

DLG

cc: Fred J. Baxter, Esq.
Larry Weeks, Esq.
James E. Fisher, Esq.

J U N E A U B A R A S S O C I A T I O N

6645 N. Douglas Highway
Juneau, Alaska

January 7, 1987

Honorable Jim Duncan
State Senator
State Capitol
P.O. Box V
Juneau, Alaska 99811

Honorable Fran Ulmer
State Representative
State Capitol
P.O. Box V
Juneau, Alaska 99811

Honorable Bill Hudson
State Representative
P.O. Box V
Juneau, Alaska 99811

Re: Amendments to AS 44.37.025 (Recording Documents);

Dear Juneau Legislative Delegation:

There is a need for new legislation to correct a serious problem with recording documents in Alaska. In recognition of that difficulty, the Juneau Bar Association, at its regular meeting on December 5, 1986, adopted the recommendation of its Committee on the Office of the Recorder, copy enclosed. The committee was formed as the result of numerous complaints about the many new restrictions on the right to record documents that were imposed through the rule-making power of the Department of Natural Resources, which has jurisdiction over the Office of the Recorder.

In addition to amending existing legislation, we are requesting that new regulations be adopted by DNR. However, we request that a bill be drafted to provide guidelines restricting future rule-making power to those matters of legitimate concern to the Office of the Recorder. Such an amendment to the statute should make it clear that the public has a right to record legal documents and that the Office of the Recorder is not to judge the internal legal integrity of documents but simply to record them

if they meet certain minimum requirements.

As to the rule-making power of the department, six recommendations are contained within the committee's report. However, the department might well consider several other changes in its current regulations. The committee restricted itself to the most obvious areas of needed change. The regulations could be further amended to provide that the Recorder may not refuse to record or file a document because:

- it lacks a title reflecting its overall content;
- it does not contain a "return to" address;
- the individual who incurred an assessment is not named (even though the property against which the assessment is placed is described and the party claiming the assessment is identified).

The Juneau Bar Association is not opposed to all regulation of the right to record. The new regulations are, however, onerous. More importantly, they are constituting a substantial restriction on the right to place a document on the record as public notice. Many times a document serves that purpose even though the document could admittedly be improved in its context and could be more complete than it is. But the right to record and create the public notice for the protection of parties is of paramount importance. Perfection in legal documents is desirable but many people making use of the Recorder's Office are not lawyers or skilled title examiners. Failure to successfully record can have dire results when intervening filings place a party in a secondary position.

We will appreciate your assistance in correcting the problem through the amendment of AS 44.37.025 to insure that future regulations will not contravene public policy. Thank you for your cooperation in this matter.

Very sincerely yours,

JEF

James E. Fisher, President
Juneau Bar Association

ENCL

COPY

REPORT OF COMMITTEE ON OFFICE OF THE RECORDER

The Committee met on August 22nd. The work of the Committee was assigned to its members. Larry Weeks, Fred J. Baxter, and Douglas Gregg. Bruce Hansen of Title Insurance Agency was invited to attend that meeting as an ex-officio member. He was requested to make inquiries of other title companies in an effort to obtain their viewpoints on the current difficulties in recording documents in Alaska. Fred Baxter spent some time outlining the essentials of a hypothetical complaint for damages. Larry Weeks explored the question whether the Office of the Recorder can, under the language of the statute requiring him to record instruments, refuse to record in reliance on the new regulations. Fred concluded that a person suffering damages by reason of the recorder's refusal to record an instrument could frame a good cause of action in many instances. Larry concluded that there would be a good chance, in a declaratory judgment action, to secure a judgment invalidating many of the regulations in question.

Your chairman met with Mr. Hansen on November 7th, at which time Mr. Hansen had received and compiled the results of an informal poll conducted among title insurance offices throughout the state. There were over 35 written responses (some did not answer every question.) Mr. Hansen had posed 15 questions in the poll. A simple "yes" or "no" was solicited to these questions.

The top of the poll asked whether the recipient felt that the Recorder should refuse to record or file a document when the document had certain attributes. These attributes were described in the 15 questions he selected. (Poll and results annexed.) There was near unanimity on several of the 15 items, with a more or less equal division of other items. Comments of respondents are omitted from this report. Several respondents sent letters praising Mr. Hansen for taking a personal hand in the difficulty.

A summary of the poll results shows general dissatisfaction with the system currently being employed by the Recorder in rejecting documents offered for recording.

Your committee's proposed amendments to the statute would help ensure that when new rules and regulations are adopted they will be circumscribed in such manner as to prevent unreasonable or unnecessary restrictions.

The Committee agrees that there is a need for modification in the existing regulations entirely apart from our proposed amendment to AS 44.37.025 which grants rule making power to the Department of Natural Resources. It may adopt regulations ". . . prescribing the records to be maintained and the instruments to be recorded." The statute currently lacks any restrictions or guidelines as to the scope of that power. An amendment would

help ensure that over-zealous rule-making will not in the future impair the ability of the public to make reasonable use of the Recorders' Offices.

Such an amendment to the statute could articulate a public policy. For example, it might state something along these lines:

PREAMBLE. The Legislature recognizes and therefore finds as follows:

1. The recording of legal documents of the kind customarily recorded throughout the United States is an essential State function.
2. The time and place that a document was placed of record may well be more important than the underlying sufficiency of that document from a strictly legal standpoint.
3. The Recorder's Office exists primarily for the benefit and convenience of the general public.
4. Commercial institutions, the business community, banks, and private individuals cannot safely function without the protections afforded by the right to give public notice through the ability to record their legal documents.

BE IT ENACTED etc. etc. . . . that public policy of this State is declared as follows: to maintain a convenient means of regularly recording legal documents and to obtain information concerning existing recorded documents. In the making of rules and regulations to facilitate the legitimate administrative needs of the various recording offices, reasonable doubts shall be resolved in favor of recording rather than of rejection. The Recorder shall not make judgments as to the legality of the contents of any document offered for recording. Nevertheless, the Department of Natural Resources shall adopt such rules and regulations as it requires to control indiscriminate filings of documents that do not meet certain minimum requirements. These regulations may include but shall not be limited to the requirement for a legal description, if needed, names of parties, capacity of parties, legibility and other such reasonably required information to assure that the Recorder's Office functions in a manner consistent with the needs of the citizens of this state.

The foregoing suggestions for a statutory change to control the rule-making authority of DNR is one suggestion. The second is that a request be made to DNR for proposed new amendments to the existing provisions contained in the Alaska Administrative Code relative to recording. Your Committee recommends that at least the following amendments be specifically requested of DNR:

1. All documents valid at the time they were made shall be recorded, notwithstanding that they may not meet the requirements contained in later-adopted rules and regulations.
2. A document shall not be rejected on the ground that it serves more than a single purpose nor shall it be required that a document be recorded separately for each of the

- various purposes for which it may appear to stand. (This shall not preclude the multiple recording by the offering party of a document which has several purposes.)
3. A document which makes reference to an attached exhibit shall not be rejected on the ground that the exhibit does not contain a label.
 4. A document shall not be rejected on the ground that it lacks the recording information contained in another document that is being amended by the one being offered.
 5. An official certified document from any governmental office in this state or a sister state shall not be rejected on the ground that it is not the original provided it is legible.
 6. A document shall not be rejected on the ground that it does not specify the name of the recording district provided that that information is given to the Recorder by the person offering the document, or such information is contained in a cover letter accompanying the document. (The information so received by the Recorder may be noted by the Recorder elsewhere on the document for future reference.)

CONCLUSION

It is recognized that many of the existing regulations may be desirable in the abstract. However, uncompromising loyalty to multiple details, often of questionable importance, result in the rejection of instruments and consequent delays in giving notice. Such delays can have disastrous results. All persons who are drawing legal instruments and submitting them for recording are not attorneys or title companies. The public's right to record ought to be paramount.

DATED: December 5, 1986.

Respectfully submitted,

Douglas L. Gregg

Larry Weeks

Fred J. Baxter

Do you feel that the recorder should refuse to record or file a document because:

YES 10

- 17 15 Contains no "return to" address.
- 30 4 Lacks trustee name on deed of trust.
- 29 8 Lacks real property description.
- 15 17 Lacks a title reflecting its overall content.
- 26 10 Document not executed entirely in English.
- 26 9 Lacks the recording information of the original document being amended, corrected, extended, modified, or released.
- 16 13 Document is larger than 8 1/2 by 14 inches.
- 29 9 Document must state in what capacity the signatory executed the document; individually, as attorney-in-fact, partner, corporate officer, executor, administrator, guardian or trustee.
- 22 11 Lacks the name of the recording district in which it is to be recorded.
- 16 14 Lacks reference to attached exhibit/Exhibit not clearly labeled.
- 26 5 Lacks attached exhibit when reference is made to such.
- 5 27 An original, recordable document may not be accepted as an attachment to another document.
- 3 32 The document serves more than one purpose. Recording fee is charged separately for each purpose.
- 19 14 Does not name person against whom assessment is placed.
- 3 29 Document is valid instrument executed prior to effective date of regulations but does not conform to current regulations.

282 217

COMMENTS:

499 RESPONSES

APPROX 35 INDIVIDUAL RESPONSES