



Working Together for Secure and Accurate Elections

Contact Person:

David Beirne, Executive Director
Election Technology Council
14173 NW Freeway, #239
Houston, TX 77040
Ph: 713.896.9292
Cell: 281.772.4548
e-mail: dbeirne@electiontech.org

For Immediate Release

ELECTION TECHNOLOGY COUNCIL ISSUES PUBLIC COMMENTS FOR FEDERAL VOLUNTARY VOTING SYSTEM GUIDELINES

Houston, TX – May 5, 2008 – The Election Technology Council has released its public comments to the draft Voluntary Voting System Guidelines (VVSG) currently before the United States Election Assistance Commission. The first round of public comments have come to a close and the EAC will now be working to address the concerns expressed within the draft document with another round of public comments to follow prior to the VVSG official adoption. Adherence to federal voting system standards is strictly voluntary by the states, however approximately 40 states currently require their voting systems to achieve federal certification.

“The current draft of the VVSG represents a document that is entirely driven in policy rather than in recognition of the need for clear performance and security requirements,” stated David Beirne, Executive Director of the Election Technology Council. “Rather than focusing on improving deficiencies within the previous two versions of voting system standards, the EAC is now forced to consider a policy document which will either revolutionize the voting experience for the average American voter or result in producing vast market failure,” Beirne added.

Within the proposed voluntary voting system guidelines, the Election Technology Council has recognized three primary policy problems:

- **Software Independence:** Each voting system submitted for federal certification would have to be either an optical scan ballot or a voter verifiable paper audit trail. Not all states which currently require federal certification mandate a paper trail to their voting machines. From an industry standpoint, the leading voting system providers offer these platforms, but the ETC recognizes this as a clear design requirement and one that does not exist for any other industry.
- **Innovation class:** The innovation class as proposed within the VVSG is an attempt to deflect criticisms over prescriptive design requirements by offering this classification to voting systems

which remain software independent, but do not offer paper as the solution. This classification recognizes the prescriptive nature of software independence, but it also attempts to hold out hope that future technologies will be developed that meet software independence requirements. It is short-sighted to believe that future innovations will not be limited by the software independence requirement as it completely ignores the potential for continuing improvements to software development and robust security features which could be incorporated into a software dependent platform.

- **Open Ended Vulnerability Testing (OEVT):** OEVT, as proposed within the VVSG, requires each voting system to undergo a security review by a computer security expert. The parameters for this security review are entirely subjective and this subjective nature of the review process is embraced fully within the VVSG. If a voting system fails this subjective review, the voting system fails certification. In addition, the security review doesn't actually require a documented penetration of a voting system's security architecture, rather it permits only a plausible description of a scenario in which this may occur. While the Election Technology Council supports increased security requirements for the industry, the notion that products will be subject to varying level of standards based on the subjective views of the review calls into question the fairness of the process and the ability for the Election Assistance Commission to maintain a standardized level of quality.

About the Election Technology Council (www.electiontech.org)

The Election Technology Council (ETC) consists of companies that offer voting system technology hardware products, software and services to support the electoral process. The ETC represents manufacturers of the voting equipment used by over 90% of the population in the United States. These companies have organized as an industry trade association to work together to address common issues facing the industry. Membership in the ETC is open to any company in the election systems marketplace. Current members of the Election Technology Council include Election Systems & Software, Hart InterCivic, Premier Election Solutions and Sequoia Voting Systems.

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