

November 16, 2007

Thomas Wilkey
Executive Director, United States Election Assistance Commission
1225 New York Avenue, NW
Suite 1100
Washington, DC 20005

Dear Mr. Wilkey:

As we rapidly approach the 2008 Presidential Primary cycle, it is important to share some concerns the Election Technology Council (ETC) has in regards to the timeliness of the certification process now administered by the Election Assistance Commission (EAC). Although we respect the EAC's commitment to maintaining a robust certification process, delays in certifying systems through the EAC-administered certification process are negatively impacting the ability of the industry to deploy State required enhancements to their products for the 2008 Primary Election Calendar. We urge the EAC to examine the current certification process for areas of improvement and we reiterate our commitment of working with the EAC, on a continuing basis, to avoid further delays.

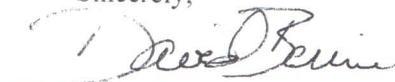
As an industry, it is important for us to raise your awareness to issues as we see them on the horizon or as they confront us directly. We realize that the current federal certification process is simply maturing. As with any new process, we also understand that guidance will be sought on the application of voting system guidelines and testing procedures administered through the Voting System Test Laboratories (VSTLs). Below is a listing of the contributing factors we feel are creating delays in the process:

1. Interpretations requested from the VSTLs in the application of the Voting System Standard (VSS) which has delayed adoption of Test Plans;
2. The VSTL Program Manual which will address many of the outstanding issues/concerns regarding the certification process and provide clear procedural requirements to the VSTLs and Manufacturers has yet to be published;

The absence of new certifications in time for the 2008 Primary Election cycle will require the need for less-than-optimum procedures to accommodate the needs of customers based on changes within the respective States. Although the industry recognizes that the voting system standards are voluntary, no one's interest is served if each State is placed in a position of opting out of, or waiving, the EAC-administered certification due to delays which may be deemed unacceptable for the States.

I encourage you and the EAC Commissioners to quickly develop a means to assess any inefficiencies in the EAC certification process and work toward moving products through in an expedited, but substantive manner. Both the EAC and the voting system industry are charged with ensuring adequate services to the voters. We can only achieve this objective through a collaborative effort and due diligence to address situations as they arise. If the ETC can assist in any way, either as a resource or facilitator for the industry, please let me know.

Sincerely,



David Beirne
Executive Director

cc: EAC Commissioners
Brian Hancock