

Section Comments Sorted by Section Number

Section Comments - Sorted by Section Number						
Reference Number	Section	Page Number	Line Number	Attach File	Comment	Accept/Reject
617 ...		4		NULL	[Volume I, Appendix C] 6.0.2.2 Usability There is a spacing error, too much space, just above this	Accepted
620 ...	E-2			NULL	[Volume 1, Appendix E] Vol 1, appendix e Page 2, spacing error between 1 & 2	Accepted
677 ...		4		NULL	[Volume II, Appendix C] On your page, there are spacing errors between 4-7 lines [Note* comment included chart that cannot be displayed here. Correction is for extra lines below lines 4,5,6 of the chart.]	Accepted
678 ...		1		NULL	[Note* Actually Volume II, Appendix A] Vol 25, appendix a A. 1. 1. references The test lab shall list all documents that contain material used in preparing the test plan. This list shall include specific references to applicable portions of the ** g	Accepted
681 ...		8		NULL	[Volume II, Section A] Page A 8 • Stress tests: These tests investigate the system's response to transient overload conditions. Polling place devices shall be subjected to ballot processing at the high volume rates at which the equipment can be opera	Accepted
682 ...		9		NULL	[Volume II, Section A] a.5.1 data recording The test lab shall identify all data recording requirements (e.g.; what is to be measured, how tests and results are to be recorded). The test lab shall also design or approve the Wrong punctuation e.g.,	Accepted
467 ...				NULL	[Volume I, Appendix D] Comments on Section 1.2.2 End to End Cryptographic IDV Systems The general description of End to End Cryptographic IDV systems included in Appendix D is based on a specific implementation of these systems: the receipt-based system	Accepted
473 ...				NULL	[Volume I, Appendix D] Section D.5 End to End (Cryptographic) IDV Systems Comments on End to End IDV Systems Characteristics In Section 3.1.2 of this document, we proposed to divide the End to End IDV systems in two subcategories: receipt-based systems	Accepted
572 ...				Comments o	See attached document.	Accepted
618 ...	D-9		13	NULL	[Volume I, Appendix D] (Note* Actually section 2.1, not 1.1) 1.1 An independent dual verification voting system produces two distinct sets of records of ballot choices via interactions with the voter such that one set of records can be compared again	Accepted

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346 ...			NULL	[Appendix B] The reference to Mil-Std-498 is in several places. It should logically only be in section B.1.	Accepted	Carol Paquette	
354 ...			NULL	[Volume 1, Appendix D, 1.2.4] Section 1.2.4, first paragraph, last sentence/second paragraph. These two sentences are duplicates.	Accepted	Carol Paquette	
466 ...			NULL	[Volume I, Appendix D] Appendix D contains an informative classification of the current Independent Dual Verification (IDV) systems. In the sections below, we propose some changes to the description and classification of some of these systems. As discu	Accepted	Merle King	
470 ...			NULL	[Volume I, Appendix D] The definition of direct IDV systems should include all those systems that allow voters to directly verify the correctness of their votes using a record that represents exactly their votes. This record (e.g., paper, an electronic	Accepted	Merle King	
471 ...			NULL	[Volume I, Appendix D] Section D.2 Core characteristics for Independent Verification Systems	Accepted	Merle King	
472 ...			NULL	[Volume I, Appendix D] Comments on Cryptographic Characteristics 2.1.10 The cryptographic software in independent verification voting systems is approved by the U.S. Government's Cryptographic Module Validation Program (CMVP) as applicable. We strongly	Accepted	Merle King	
614 ...			NULL	[Volume I, Appendix B] Volume 1, appendix b no problems with this!	Accepted	Merle King	
619 ...	D-9	21	NULL	[Volume 1, Appendix D] (Note* Actually 2.1.1, not 1.1.1) 1.1.1 The voter verifies the content of each record and either (a) verifies at least one of the records directly or (b) verifies both records indirectly if the records are each under the contro	Accepted	Merle King	
675 ...	2		NULL	[Volume 2, Appendix B] [Note* Actually at the end of section 2.B.1.2] Vol 2, appendix b A more extensive report is prepared, for changes that have extensive impact on the system design and/or operations. Why the "?"	Accepted	Merle King	
679 ...	5		NULL	[Volume II, Appendix A] A.4.3.1 The test lab shall review the results, submitted by the vendor, of any previous examinations of the equipment to be tested. The results of these examinations shall be compared to the performance characteristics specif	Accepted	Merle King	
683 ...	11		NULL	[Volume II, Section A] A.6.4 In this section, the test lab shall also identify all test operations personnel, and their respective duties. In the event that the operator procedure is not defined in the vendor's Don't believe a comma should be betwee	Accepted	Merle King	

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339 ...		3	VWSG Non-C	[Volume 1, Appendix C] 1.- Paragraph with "no practical means ..." should be rewritten. Volume 1, Appendix C Best Practices for Election Officials; Pg 3; under Best Practices, the fourth point reads: "Appropriate procedures are needed to ensure	Accepted	Carol Paquette	
341 ...		3	NULL	[Volume 1, Appendix C] 3.- Paragraph with "ballot and input controls are visible only to the voter" should be rewritten Volume 1, Appendix C Best Practices for Election Officials; Pg 3; under Best Practices, the first point reads: "The ballot and any	Accepted	Carol Paquette	
342 ...		3	NULL	[Volume 1, Appendix C] 4.- Paragraph with "audio interface is audible only to the voter" should be rewritten Volume 1, Appendix C Best Practices for Election Officials; Pg 3; under Best Practices, the second point reads: "The audio interface is audibl	Accepted	Carol Paquette	
347 ...			NULL	[Volume 1, Appendix B] Although the VWSG references the OASIS EML (section 6.8.6.6), it is not listed in the references. [Volume 1, Appendix D, 1.2.1] Although this type of system may be more secure, it will be less usable to a voter. After the voter has waited in line, the voter needs to stop at three stations, first to check in with a poll worker and get a token, then mo	Accepted	Carol Paquette	
348 ...			NULL	Appendix C Best Practices for Election Officials; Pg 3; under Best Practices, a fifth point shall read (or something to that effect): (See Attached)	Accepted	Carol Paquette	
413 ...			S385_VWSG	[Vol II, Appendix C] Vol 2, appendix c T of C C1 misaligned at right margin	Accepted	Merle King	
676 ...			NULL	[Volume II, Appendix A] A.4.3.2. Should a time be given for the environmental tests Most machines will be in storage for 11 months a year Temperature and humidity could be causes for major problems	Accepted	Merle King	
680 ...		6	NULL	Dear Sir or Madam: New Jersey Protection and Advocacy, Inc., is the designated protection and advocacy system for individuals with disabilities in New Jersey pursuant to the Developmental Disabilities Assistance and Bill of Rights Act of 2000, 42 U.S.C.	Accepted	Merle King	
737 ...			Voting Syste	Vol. II, Appendix B Current: B.5 Qualification Test Results and Recommendation Change: Vol II, Appendix B B.5 Certification Test Results and Recommendation Nature of Change: Deprecated term	Accepted	Merle King	
978 ...	B-3		NULL		Accepted	Merle King	

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979 ...	A-1		NULL	Vol. II, Appendix A (Second Paragraph) Current: It is intended that the test lab use this Appendix as a guide in preparing a detailed test plan, and that the scope and detail of the requirements for certification be tailored to the type of hardware,	Accepted	Merle King	
1889 ...			NULL	Appendix C The section references are out of sync beginning with C2.	Accepted	Merle King	
1890 ...			NULL	Appendix E The appendix needs to be revised to draw upon the proper sections of the 2005 VVSG rather than the 2002 VSS.	Accepted	Merle King	
1891 ...			NULL	Volume II, Section 2 At some point after the adoption of the 2002 voting system standards, the current ITA trace matrix was developed as a requirement for 2002 compliance testing without public review, comment, or formal order of NASED. This section ou	Accepted	Merle King	
1977 ...			NULL	Part two of three Section 6.9 The unique identifier may be applied when the paper record is scanned by a scanner equipped with an imprinter. The unique identifier also may be printed on the paper record when the record is initially created. 6.9	Accepted	Merle King	
1979 ...			NULL	Part one of three Section 6.9 Live auditing techniques are crucial to verify voting system accuracy during the live election. The following proposed addition to the VVSG describes the use of statistical live auditing techniques to verify that paper	Accepted	Merle King	
1985 ...			NULL	Part three of three Section 6.9 6.9.3 The list of record unique identifiers to hand-count shall be=20 determined in a manner that is extremely difficult to predict prior to the audit, yet which generates a repeatable and publicly verifiable list	Accepted	Merle King	
2183 ...			NULL	However, the Voluntary Voting System Guidelines (VVSG) are inconsistent in the use of "shall" and "should" throughout the recommendations. Specifically, Subsection 3 of the proposed VVSG (p.2-22), which pertains to voters with "lack of fine motor control o	Accepted	Merle King	
2186 ...			NULL	Throughout the document there are references meant to encourage Acc-VS designers to conduct some realistic usability tests. We emphasize the "realistic" aspect of this statement – any tests that do not include a variety of people with a variety of disabili	Accepted	Merle King	

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2143	...				MDERC Cor	For introductory comment The Miami-Dade Election Reform Coalition (MDERC or The Coalition) observed poll-closing procedures in Miami-Dade County in the November 2004 Presidential election, and reported its findings in GET IT RIGHT THE FIRST TIME: Poll	Accepted	Merle King	
558	...				Comments o	hop [Multiple sections. See attached comments.] please along to correct person am attaching my comments on the proposed voluntary voting system guidelines since i made notes in color which won't work with this email but does as an attachment i	NULL	NULL	
468	...				NULL	[Volume I, Appendix D] Receipt-based systems operate as follows (the description is identical to the one in the Guidelines with the exception of a change in point 2): 1. A voter uses a voting station such as a DRE to make ballot choices. 2. The voting	Accepted	Merle King	
469	...	D-6	15-16		NULL	[Volume I, Appendix D] Comments on Section 1.2.4 Direct IDV Systems These systems are defined (page D-6, lines 15-16) as those that "... produce a record for voter verification that the voter may verify directly with voter's sense...". In the glossary of term	Accepted	Merle King	
615	...		1		NULL	[Volume I, Appendix C] 2.2.7 Human Factors The area (or some other word) of Human factors is concerned with the understanding of interactions among humans and (Note: human factors doesn't agree with verb is...)	Accepted	Merle King	
616	...		3		NULL	[Volume I, Appendix C] 2.2.7 Human Factors Page 3 doesn't list for what the Best Practices are. In gray it says for election officials but on the list, it's just best practices. Just before "C2 Best Practices for Security"	Accepted	Merle King	
1252	1				NULL	Appendix D regarding "Independent Dual Verification" To ensure the accuracy of vote counts by auditing, then one needs to have records to audit that are independent of insiders within the system.	NULL	NULL	
1329	1				WVSGComm	The draft version of the Voluntary Voting System Guidelines (WVSG) under consideration for adoption by the U.S. Election Assistance Commission (EAC) fails to achieve the necessary goals of insuring reliability, auditability, and transparency for election e	NULL	NULL	
1299	1				NULL	Regarding Appendix D: When elections are contested, the voter verified paper ballots MUST be used. Anything done on an electronic machine can always be hacked.	NULL	NULL	
1727	1				NULL	Volume Appendix B No comments.	NULL	NULL	

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1734 1	D-1	25	NULL	82 Comment: Use of "ballot records" limits the scope of audibility. Recommended change: Change to "election results." Rationale: The objective is to be able to audit an election, not just ballot records	NULL	NULL	
1735 1	D-1	17	NULL	83 Comment: How is the threat of vendor collusion addressed?	NULL	NULL	
1739 1	D-5	18	NULL	84 Comment: Witness systems are not accessible	NULL	NULL	
1741 1	D-6	27	NULL	85 Vol. I App. D Comment: If OCR is being used for "marks recognition", it should be specifically outlawed for counting ballots. When OCR is used for "marks recognition", the OCR engine makes an assumption that the mark is filled in.	NULL	NULL	
1743 1	D-7	4	NULL	86 Vol. I App. D Comment: Bad assumption -- optical scanning processes are notoriously inaccurate, that's why jurisdiction created the 1% re-count. If this is referring to "digital imaging", the distinction must be made clear.	NULL	NULL	
1746 1	D-7	32-35	NULL	87 Vol. I App. D Comment: Why isn't the accessibility question addressed in the other system discussions?	NULL	NULL	
1733 1	D-1	10	NULL	81 Vol. I Appendix D Comment: States a primary objective for using electronic voting systems is the production of voting records that are highly precise. Recommended change: Change to "...production of election results that are highly precise and	NULL	NULL	
1728 1		Last bullet	NULL	Volume I Appendix C 78 App C.1.2.2.7.1 Comment: Voters with cognitive disabilities? Recommended change: This needs to be bounded in some fashion. Rationale: Without bounds the statement doesn't mean anything.	NULL	NULL	
1730 1		6 First bullet	NULL	79 App C.2.6.0.2.2 Comment: Preventing a race from spanning two columns or pages is not practical. There are physical limitations that can not be ignored. Recommended change: Present guideline for navigation aids when this does occur or develop	NULL	NULL	
1732 1		6 First bullet	NULL	80 App C.2.6.0.4.1 Comment: Voting software can be obtained by "an EAC accredited test authority"? Recommended change: The testing authorities can provide measures to ensure the software provided by the vendor is that which they tested but the	NULL	NULL	
1768 1	D-10	6	NULL	Vol. I App. D 88 Comment: If the creation and verification system are two independent processes, different media is not required.	NULL	NULL	
1773 1	D-10	19	NULL	Vol. I App. D 89 Comment: What are "multiple" records? Recommended change: Change to "dua" records	NULL	NULL	

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1776	1	D-11	4	NULL	Vol. I App. D 90 Comment: Calls for one-to-one record comparison. The accumulated results can be used. Any single error causes the whole system to be suspect. Vol. I App. D 91 Comment: The objective is to be able to audit the election, not the device. What threat does a one-to-one relationship mitigate?	NULL	NULL	
1778	1	D-11	15	NULL	Vol. I App. D 92 Comment: Calls for identification of "ballot style" Recommended change: Change "ballot style" to "precinct" Rationale: Ballot style can represent many precincts.	NULL	NULL	
1782	1	D-11	29	NULL	Vol. I App. D 93 Comment: States "whether electronic voting systems are accurately recording ballot choices."	NULL	NULL	
1786	1	D-1	28	NULL	Vol. I App. D 94 Comment: Notes "voting session identifier" Recommended change: Define "voting session identifier" Rationale:	NULL	NULL	
1789	1	D-12	1	NULL	Vol. I App. D 95 Comment: Requires CMVP approval. What support is provided for Real-Time-Operating-Systems (RTOS) (very limited) Recommended change: Must support implementation for Real-Time-Operating- Systems	NULL	NULL	
1799	1	D-12	19	NULL	Vol. I App. D 96 Comment: Reads "... verification station log...." Recommended change: Change to " verification station shall log..."	NULL	NULL	
1804	1	D-13	21	NULL	Vol. I App. E-3 107 Comment: This appears to be just further clarification of previous sections. No additional standards information is provided. Recommended change: Specifically state that Appendix E is provided for informational purposes and	NULL	NULL	
1847	1	2 All		NULL	Vol. I App. E-4 108 Comment: Color: "The use of the 16-color pallet or a larger color pallet is required, when voter adjustment of color is provided." Page 1, a. 2) "Adjust color settings, when color is used." None of the examples provided in E.3	NULL	NULL	
1851	1	E-4	5	NULL	139 Vol. 1 - G Comment: No mention of cost expectations. How much should it cost to have a voting system certified? Without mentioning cost the implication seems to be that the certification issues must be met at any expense. Recommended c	NULL	NULL	
1921	1			NULL	Vol. I App. D 97 Comment: Allows the voter to reject his/her ballot at the verification station. How is the voter enabled to cast another ballot? Procedurally? The capture station has no knowledge of the rejection so it records can no longer be u	NULL	NULL	
1810	1	D-13	22	NULL		NULL	NULL	

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1816	1	D-14	22	NULL	Vol. I App. D 98 Comment: This level of verification requires the verification station to have knowledge of the election. Recommended change: Add allowance for data to be supplied to the verification station from the same election management s	NULL	NULL	
1820	1	D-14	26	NULL	Vol. I App. D 99 Comment: This is not required if the token is a 'write-once' media and can't be changed. Recommended change: Add allowance for a token to be a write-once media and not require cryptographic authentication.	NULL	NULL	
1823	1	D-15	9	NULL	Vol. I App. D 100 Comment: Requires a one-to-one relationship between records. Rationale: A summation of the records is sufficient to compare. A 1% audit is irrelevant. If the summation of the records don't match, a crime has been committed	NULL	NULL	
1826	1	D-15	22-23	NULL	Vol. I App. D 101 Comment: States "...from accepted memory devices..." defining tokens as memory devices. A token is not required to be a memory device. Recommended change: Change to "...from accepted tokens..."	NULL	NULL	
1830	1	D-16	8	NULL	Vol. I App. D 102 Comment: Why can't the tokens or capture system be used to determine if records are missing or substituted?	NULL	NULL	
1832	1	D-18	28	NULL	Vol. I App. D 103 Comment: Why is this acceptable? It is not acceptable to subject DREs to extensive and stringent testing and yet witness systems can be approved under these conditions.	NULL	NULL	
1839	1	D-22	8	NULL	Vol. I App. D 104 Comment: However, In order to prove that the choices were NOT recorded correctly, the voter would need to surrender his or her privacy.	NULL	NULL	
1841	1	D-23	2	NULL	Vol. I App. D 105 Comment: Why are cryptographic solutions able to be verified and DREs are not?	NULL	NULL	
1844	1		NULL	NULL	Vol. I App. E 106 Comment: Overall comment: Appx. E is written broadly, with a variety of options meant to assist vendors in meeting the guideline with relative ease, while seeming to require voter control to meet visual needs related to text siz	NULL	NULL	
302	1	1	1	123.txt	RE: Appendix D (your comment form does not permit Section: Appendix D or Section: D-1 to be entered) "used in audits" should be "used in independent audits" where independent means independent of insiders within the voting system and independent of the	Accepted	Juliet Thompson	
1182	1	D-1	22	NULL		Accepted	Merle King	

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1189	1	D-3	3	NULL	RE: Appendix D (your comment form does not permit Section: Appendix D or Section: D-1 to be entered) Cryptographic audit schemes merely verify that the individual voter voted, but not that all the votes were correctly counted. ALL voters could verify th	Accepted	Merle King	
1190	1	D-3	6-May	NULL	RE: Appendix D (your comment form does not permit Section: Appendix D or Section: D-1 to be entered) Please explain how such video capture systems would be practical to audit, would not require expensive equipment and hard disk space, would not add to t	Accepted	Merle King	
1191	1	D-3	10-Aug	NULL	RE: Appendix D (your comment form does not permit Section: Appendix D or Section: D-1 to be entered) This lumps two entirely different types of voting systems together. Please differentiate between voting systems that record the ballot of record on a di	Accepted	Merle King	
1192	1	D-4	7-May	NULL	RE: Appendix D (your comment form does not permit Section: Appendix D or Section: D-1 to be entered) This is a test that the two records match, but it is not an "independent" audit of the accuracy of vote counts as intended by voters because it does not	Accepted	Merle King	
1193	1	D-4	10-Sep	NULL	RE: Appendix D (your comment form does not permit Section: Appendix D or Section: D-1 to be entered) Both records are electronic and not directly verifiable by the voter. According to your own standards, they would have to be programmed by different ven	Accepted	Merle King	
1194	1	D-4	20 - 22	NULL	RE: Appendix D (your comment form does not permit Section: Appendix D or Section: D-1 to be entered) It is conceivable that the capture station could be misprogrammed (in error or deliberately) to write incorrect votes to the toke and store incorrect v	Accepted	Merle King	
1195	1	D-4	27 - 28	NULL	RE: Appendix D (your comment form does not permit Section: Appendix D or Section: D-1 to be entered) It isn't practical to inspect and test to try to ensure the integrity of the vote counting programs because: (a.) many voting systems use microsoft wi	Accepted	Merle King	
1196	1	D-4	37 - 38	NULL	RE: Appendix D (your comment form does not permit Section: Appendix D or Section: D-1 to be entered) But if the total sum of ballots cannot be demonstrated to have been counted correctly, this encryption scheme does not solve the right problem. i.e. it	Accepted	Merle King	

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1197	1	D-5	4-Mar	NULL	RE: Appendix D (your comment form does not permit Section: Appendix D or Section: D-1 to be entered) Please explain how the voter, after an election, can use his receipt to verify that his choices were recorded correctly but yet prevent that same voter	Accepted	Merle King	
1210	1		1	1 NULL	It is Appendix D that I am commenting on. Verification needs to be EXTERNAL and MANUAL. Your suggested Dual Verification by INSIDERS does nothing to prevent ELCTION FRAUD. THE only verification is a system that is transparent to EVERY VOTER - We	Accepted	Merle King	
1226	1	D1		NULL	Independent dual verification by which one electronic record is verified by another electronic record does NOT ensure accuracy of vote counts. A paper trail is needed for a real verification.	Accepted	Merle King	
1242	1			NULL	The form was a little hard to use..had but I had to use Section "1" because the form did not permit Appendix D or D-1 to be used as sections. Please forward them to the right authors. Appendix D regarding "Independent Dual Verification" contains logi	Accepted	Merle King	
1183	1	D-1	32- 37	NULL	RE: Appendix D (your comment form does not permit Section: Appendix D or Section: D-1 to be entered) The primary purpose should instead be to verify that the vote counts are an accurate reflection of how voters voted. All these measures could be effect	Accepted	Merle King	
1184	1	D-2	2	NULL	RE: Appendix D (your comment form does not permit Section: Appendix D or Section: D-1 to be entered) It is inadequate for records to be merely "verifiable". Research has shown that fewer than 1/3 of voters verify their ballots in systems which require	Accepted	Merle King	
1185	1	D-2	14 - 17	NULL	RE: Appendix D (your comment form does not permit Section: Appendix D or Section: D-1 to be entered) This is an inadequate definition of "independent" for voting systems because in case (b) both records could be incorrect if neither has been verified di	Accepted	Merle King	
1287	1			NULL	Appendix D: If one is trying to ensure the accuracy of vote counts by auditing, then one needs to have permanent records to audit that are independent of the electronic system, not records that are independent of each other. Appendix D: In banking, au	Accepted	Merle King	
1186	1	D-2	19 - 20	NULL	RE: Appendix D (your comment form does not permit Section: Appendix D or Section: D-1 to be entered) Explain how using such identifiers could be applied without risking revealing the identities of the voters.	Accepted	Merle King	

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1256	1	?	?	NULL	Regarding Section D: It is completely absurd to assume that a machine can check itself. Just like spammers can always find a way to get their spam through, people with intent and enough money will find their way to subvert any system to preserve a true i	Accepted	Merle King	
1330	1			NULL	regarding appendix D: Please do not rely solely on machines for something so important as our COUNTRY election! They can be hacked, pre-set, manipulated, break down, malfunction. Only randomly selected Voter Verified Paper Ballots with a 5% recount can	Accepted	Merle King	
1342	1			NULL	The draft version of the Voluntary Voting System Guidelines (VMSG) under consideration for adoption by the U.S. Election Assistance Commission (EAC) fails to achieve the necessary goals of insuring reliability, auditability, and transparency for election e	Accepted	Merle King	
1345	1			NULL	As a legacy derived document, the VMSG repeats many earlier mistakes of earlier standards in both content and structure. Foremost among its problems is that the VMSG, like its predecessors, sits somewhere between being a design standard and a performance	Accepted	Merle King	
1359	1			VMSGComm	The draft version of the Voluntary Voting System Guidelines (VMSG) under consideration for adoption by the U.S. Election Assistance Commission (EAC) fails to achieve the necessary goals of insuring reliability, auditability, and transparency for election e	Accepted	Merle King	
1187	1	D-2	28 - 30	NULL	RE: Appendix D (your comment form does not permit Section: Appendix D or Section: D-1 to be entered) This process would only verify that the two records agree with each other, but not that either record reflected how the voter intended to cast his/her b	Accepted	Merle King	
1188	1	D-2	31 - 33	NULL	RE: Appendix D (your comment form does not permit Section: Appendix D or Section: D-1 to be entered) If both records are electronically recorded by the same vote-casting process, both could easily be compromised or recorded incorrectly, unless one recor	Accepted	Merle King	
1198	1	D-5	9-Jun	NULL	RE: Appendix D (your comment form does not permit Section: Appendix D or Section: D-1 to be entered) What is to prevent someone else from standing over the voter and likewise checking the choices of the voter so encourage vote-buying? If another pe	Accepted	Merle King	

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1199	1	D-5	26 - 28	NULL	RE: Appendix D (your comment form does not permit Section: Appendix D or Section: D-1 to be entered) What prevents the hands, clothing or hair of the voter from being caught in the picture and possibly revealing the voters' identity? What prevents the	Accepted	Merle King	
1200	1	D-6	15 - 19	NULL	RE: Appendix D (your comment form does not permit Section: Appendix D or Section: D-1 to be entered) Why "(albeit loosely)"? Optical scan voting systems most definitely "produce a record that the voter verifies directly with the voter's senses which	Accepted	Merle King	
1201	1	D-6	25 - 43	NULL	RE: Appendix D (your comment form does not permit Section: Appendix D or Section: D-1 to be entered) Great system if the counts are done via the barcodes, the paper ballots are used for independent audits and the scanned images of the paper ballots are	Accepted	Merle King	
1363	1			vwsg-notes: b	I apologize for not breaking this down into separate submissions. The attached text file does have each entry broken down by section, page, and line, but since this is last-minute, I don't have time to submit each part separately.	Accepted	Merle King	
1452	1			NULL	Volume I Appendix D: Witness IDV Systems will have twice the amount of testing because there are two devices to test. [Statements submitted at EAC public hearing, June 30, 2005, New York]	Accepted	Merle King	
1968	1	A-21	6	NULL	75 I App A A-21 6 Grammar Change "Voters are also may be" to Voters also may be". Correct typographical errors to improve understanding.	Accepted	Merle King	
1969	1	A-29	41	NULL	76 I App A A-29 41 Incomplete definition Change "from a single political party" to "from a single political party in contests linked to straight party voting". Correct typographical errors to improve understanding.	Accepted	Merle King	
1970	1	B		NULL	77 I App B No comments.	Accepted	Merle King	
1971	1	C		NULL	78 I App C.1 2.2.7.1 2 Last bullet Voters with cognitive disabilities? This needs to be bounded in some fashion. Without bounds the statement doesn't mean anything.	Accepted	Merle King	
1974	1	D-1	10	NULL	81 I App D D-1 10 States a primary objective for using electronic voting systems is the production of voting records that are highly precise. Change to "... production of election results that are highly precise and produced expeditiously."	Accepted	Merle King	
1975	1	D-1	25	NULL	82 App D D-1 25 Use of "ballot records" limits the scope of audibility. Change to "election results" The objective is to be able to audit an election, not just ballot records	Accepted	Merle King	

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1976 1	D-2	17 NULL	83 App D D-2 17 How is the threat of vendor collusion addressed?	Accepted	Merle King	
1978 1	D-5	18 NULL	84 App D D-5 18 Witness systems are not accessible	Accepted	Merle King	
1980 1	D-6	27 NULL	85 App D D-6 27 If OCR is being used for "marks recognition", it should be specifically outlawed for counting ballots. When OCR is used for "marks recognition", the OCR engine makes an assumption that the mark in filled in. 86 D-7 4 Bad assumption – optical scanning processes are notoriously inaccurate, that's why jurisdiction created the 1% re-count. If this is referring to "digital imaging", the distinction must be made clear.	Accepted	Merle King	
1981 1	D-7	4 NULL	87 App D D-7 32-35 Why isn't the accessibility question addressed in the other system discussions?	Accepted	Merle King	
1982 1	D-7	32-35 NULL	88 App D D-10 6 If the creation and verification system are two independent processes, different media is not required.	Accepted	Merle King	
1983 1	D-10	6 NULL	89 App D D-10 19 What are "multiple" records? Change to "dual" records	Accepted	Merle King	
1984 1	D-10	19 NULL	90 App D D-11 4 Calls for one-to-one record comparison. The accumulated results can be used. Any single error causes the whole system to be suspect.	Accepted	Merle King	
1986 1	D-11	4 NULL	91 App D D-11 15 The objective is to be able to audit the election, not the device. What threat does a one-to-one relationship mitigate?	Accepted	Merle King	
1987 1	D-11	15 NULL	92 App D D-11 29 Calls for identification of "ballot style" Change "ballot style" to "precinct" Ballot style can represent many precincts.	Accepted	Merle King	
1988 1	D-11	29 NULL	93 App D D-1 28 States "whether electronic voting systems are accurately recording ballot choices."	Accepted	Merle King	
1989 1	D-1	28 NULL	94 App D D-12 1 Notes "voting session identifier" Define "voting session identifier"	Accepted	Merle King	
1990 1	D-12	1 NULL	108 I Appx. E.4, 4, 5 Color: "The use of the 16-color pallet or a larger color pallet is required, when voter adjustment of color is provided." Page 1, a. 2) "Adjust color settings, when color is used." None of the examples provided in E.3 Design	Accepted	Merle King	
2009 1	E-4	5 NULL	73 I App A A-11 30 Definition is wrong. Change "are offices to be filled" to "are seats to be filled in a multi-seat contest". Correct typographical errors to improve understanding.	Accepted	Merle King	
1966 1	A-11	30 NULL		Accepted	Merle King	

Section Comments Sorted by Section Number

1967 1	A-16	3	NULL	74 I App A A-16 3 Capitalize words 2 and 3. Change "correction code" to "Correction Code". Correct typographical errors to improve understanding.	Accepted	Merle King	
1972 1	C-4		NULL	79 I App C.2 6.0.2.2, 4, First bullet Preventing a race from spanning two columns or pages is not practical. There are physical limitations that can not be ignored. Present guideline for navigation aids when this does occur or develop "virtual 80 I App C.2, 6.0.4.1, 6, First bullet Voting software can be obtained by "an EAC accredited test authority"? The testing authorities can provide measures to ensure the software provided by the vendor is that which they tested but they are not	Accepted	Merle King	
1973 1	C-6		NULL	95 App D D-12 19 Requires CMVP approval. What support is provided for Real-Time-Operating-Systems (RTOS) (very limited) Must support implementation for Real-Time-Operating- Systems	Accepted	Merle King	
1993 1	D-12	19	NULL	96 App D D-13 21 Reads "... verification station log...." Change to "verification station shall log..."	Accepted	Merle King	
1994 1	D-13	21	NULL	97 App D D-13 22 Allows the voter to reject his/her ballot at the verification station. How is the voter enabled to cast another ballot? Procedurally? The capture station has no knowledge of the rejection so it records can no longer be used for a	Accepted	Merle King	
1995 1	D-13	22	NULL	98 App D D-14 22 This level of verification requires the verification station to have knowledge of the election. Add allowance for data to be supplied to the verification station from the same election management system that produced the ballo	Accepted	Merle King	
1996 1	D-14	22	NULL	99 App D D-14 26 This is not required if the token is a 'write-once' media and can't be changed. Add allowance for a token to be a write-once media and not require cryptographic authentication.	Accepted	Merle King	
1997 1	D-14	26	NULL	100 App D D-15 9 Requires a one-to-one relationship between records. A summation of the records is sufficient to compare. A 1% audit is irrelevant. If the summation of the records don't match, a crime has been committed and the Department of J	Accepted	Merle King	
1998 1	D-15	9	NULL	101 App D D-15 22-23 States "... from accepted memory devices..." defining tokens as memory devices. A token is not required to be a memory device. Change to "...from accepted tokens...."	Accepted	Merle King	
2002 1	D-15	22-23	NULL		Accepted	Merle King	

Section Comments Sorted by Section Number

2003 1	D-16	8	NULL	102 App D D-16 8 Why can't the tokens or capture system be used to determine if records are missing or substituted? 103 App D D-18 28 Why is this acceptable? It is not acceptable to subject DREs to extensive and stringent testing and yet witness systems can be approved under these conditions.	Accepted	Merle King	
2004 1	D-18	28	NULL	104 App D D-22 8 However, in order to prove that the choices were NOT recorded correctly, the voter would need to surrender his or her privacy.	Accepted	Merle King	
2005 1	D-22	8	NULL	105 App D D-23 2 Why are cryptographic solutions able to be verified and DREs are not?	Accepted	Merle King	
2006 1	D-23	2	NULL	106 I Appx. E Overall comment: Appx. E is written broadly, with a variety of options meant to assist vendors in meeting the guideline with relative ease, while seeming to require votercontrol to meet visual needs related to text size, screen con	Accepted	Merle King	
2007 1	E-1		NULL	107 I Appx. E.3 2 All This appears to be just further clarification of previous sections. No additional standards information is provided. Specifically state that Appendix E is provided for informational purposes and provides no specific stan	Accepted	Merle King	
2008 1	E3-2		NULL	[Volume 1, Voluntary Voting System Guidelines Overview] P. 2, Overview Spacing before Summary of Changes (after 2 Effective Date) requirements, which all States must comply with by January 1, 2006. Summary of Changes	Accepted	Merle King	
556 1.1		2	NULL	P. 2, Overview Spacing before Summary of Changes (after 2 Effective Date) requirements, which all States must comply with by January 1, 2006. Summary of Changes	NULL	NULL	
560 1.1		2	NULL	P. 4, spacing at "5. Public Comment Process" [too much space] Volume I, Appendix A comments Try not to split definition and sources between two pages. This also applies to all sections that are numbered, use bullet points, etc.	NULL	NULL	
561 1.1		4	NULL	[Volume 1 Voluntary Voting System Guidelines Overview] p. 4, spacing at "5. Public Comment Process" [too much space] Volume I, Appendix A comments Try not to split definition and sources between two pages. This also applies to all sections that are	NULL	NULL	
557 1.1		4	NULL	In reference to: Volume I, Appendix D D.1 Independent Dual Verification Systems While IDV systems address two primary security issues as stated in bullet points in this section, they do NOT address the problem of access to the systems from the inside.	NULL	NULL	
1294 1.1		1	NULL		NULL	NULL	

Section Comments Sorted by Section Number

575 1.1	2	NULL	Volume I, Section 1 P.2, Overview Spacing before Summary of Changes (after 2 Effective Date) requirements, which all States must comply with by January 1, 2006. Summary of Changes	Accepted	Merle King	
576 1.1	4	NULL	Volume I, Section 1 p 4, spacing at "5. Public Comment Process" [too much space] Volume I, Appendix A comments Try not to split definition and sources between two pages. This also applies to all sections that are numbered, use bullet points, etc.	Accepted	Merle King	
621 1.1		NULL	No comment text	Accepted	Merle King	
1366 1.1	1	1 Mahoney - M	This includes general comments throughout the VSG, including new topics that should be included. Comment: No clear statement on the confidentiality of voting systems components required for testing and NSRL submittal. Recommended change: A section should be added to section 1 clarifying the expectations of confidentiality by vendors. At no time	Accepted	Merle King	
1597 1.1		NULL	139 I G No mention of cost expectations. How much should it cost to have a voting system certified? Without mentioning cost the implication seems to be that the certification issues must be met at any expense. Provide some language that bound	Accepted	Merle King	
2041 1.1		NULL	These comments address the objectives, and scope of the VVSG as set forth in Sections 1.1 and 2.2. In light of these comments, we also call upon EAC to reexamine the definitions in 1.5, 1.5.1, 1.5.3 and the glossary definition of voting system in Appendix	Accepted	Merle King	
2144 1.1		NULL	HAVA itself requires the Commission to broaden its vision. Section 301(b) of the Act offers an expansive definition of a voting system. That provision defines a voting system as: (1) the total combination of mechanical, electromechanical, or electronic	Accepted	Merle King	
2146 1.1		NULL	140 Comment: Cost: Vol I, Section1.1- "the Guidelines balance risk and cost" Recommended change: These are the places in the VVSG where the expense of voting system testing is mentioned. The general idea of balancing "risk and cost" is mentio	Accepted	Merle King	
1922 1.1.1		NULL	140 G All All All Cost: Vol I, Section1.1- "the Guidelines balance risk and cost" These are the places in the VVSG where the expense of voting system testing is mentioned. The general idea of balancing "risk and cost" is mentioned, but not appl	Accepted	Merle King	
2042 1.1.1		NULL		Accepted	Merle King	

Section Comments Sorted by Section Number

622	1.2	8-Feb		NULL	[Volume I, Section 2a] Volume 1 Sect 2a [Note* Actually 2.2.5.2.] 1.1.1.1 Status Messages The Guidelines provide latitude in software design so that vendors can consider various user processing and reporting needs. The jurisdiction may require so	Accepted	Merle King	
434	1.2.1.1			NULL	With respect to 2.1.1, you state print size in terms of mm. It would be more helpful to state the print size in terms of points, since many visually impaired individuals are accustomed to using point selection of fonts in computer use. For example, my da	NULL	NULL	
376	1.2.2.7	10-Feb	44	NULL	Recognizing such practical limitations, we request that item 3, of Section 2.2.7 (Human Factors) on Page 2-10 Line 44 be strengthened. We quote the section with our suggested new wording highlighted: "The voting process shall preclude anyone else from de	Accepted	Carol Paquette	
375	1.2.2.7			NULL	We also request the EAC/TGDC to broaden the term, ATI, used extensively throughout Section 2.2.7 to mean "Audio-Tactile Interface." We think the ability to vote can be extended to voters with a broad range of disabilities not covered by a strict reading	Accepted	Carol Paquette	
1598	1.2.2.7.1.1.1	13-Feb	14-Oct	NULL	Comment: This section implies that the information presented to the voter must be THE SAME regardless of the type of voting interaction (non-disabled versus the "alternative format" disabled format). Recommended change: Modify the language to clarify t	Accepted	Merle King	
1599	1.2.2.7.1.2.1.1	14-Feb	11-Sep	NULL	Comment: Even though the usability testing described in this section is only "recommended" and not required, caution should be used when considering placing anything like this in a standard. It will become a de facto standard, despite the lesser intent.	Accepted	Merle King	
1003	1.2.2.7.1.2.1.2			NULL	Standard 2.2.7.1.2.1.2 requires the Acc-VS to display two font sizes, but then right after that standard 2.2.7.1.2.1.3 seems to provide an "out" for paper ballots and worse yet, 6.0.2.2.1 clearly only requires the VVPAT to produce ONE font size (standard	Accepted	Merle King	
1007	1.2.2.7.1.2.1.2			NULL	Revise 2.2.7.1.2.1.2 An Acc-VS (and any voting station with an electronic image display) shall display all information in at least two font sizes, a) 3.0-4.0 mm and b) 6.3-9.0 mm, under control of the voter. Explanation: Makes clear that two font dis	Accepted	Merle King	

Section Comments Sorted by Section Number

509	1.2.2.7.1.2.1.3	15-Feb	1	NULL	ISSUE 1: ENSURE EQUAL ACCESS TO PAPER BALLOTS Current Standard 2.2.7.1.2.1.3 – All voting stations using paper ballots should make provisions for voters with poor reading vision. (Page 2-15, line 1)	Accepted	Merle King	
520	1.2.2.7.1.2.1.3			NULL	OTHER ISSUES In addition to these three major accessibility issues, a number of standards in the VSG continue to utilize "should" instead of "shall", including: Shape and color identification of buttons and controls (2.2.7.1.2.1.3) Delete 2.2.7.1.2.1.3 All voting stations using paper ballots should make provisions for voters with poor reading vision. Explanation: Placing this standard right after the requirement for a two font display could be misinterpreted to mean that you can	Accepted	Merle King	
1008	1.2.2.7.1.2.1.3			NULL	No Acceptance Criteria or Not Testable Section 2.2.7.1.2.1.3: All voting stations using paper ballots should make provisions for voters with poor reading vision." This is s not a testable. The type of provisions needs to be defined.	Accepted	Merle King	
1429	1.2.2.7.1.2.1.3	15-Feb	1	NULL	Comment: ANY voting station...provide synchronized audio output. Recommended change: Remove "any and replace with one per polling place. Rationale: Implies all voting stations must be disabled access units.	Accepted	Merle King	
1600	1.2.2.7.1.2.1.9	16-Feb	17	NULL	Comment: Even though the usability testing described in this section is only "recommended" and not required, caution should be used when considering placing anything like this in a standard. It will become a de facto standard, despite the lesser intent	Accepted	Merle King	
1601	1.2.2.7.1.2.2.1	16-Feb	26-28	NULL	Imprecise • Section 2.2.7.1.2.2.2 - The Acc-VS shall provide an audio-tactile interface (ATI) that supports the full functionality of a normal ballot interface, as specified in Section 2.4. The reference is too broad as Section 2.4 deals with the enti	Accepted	Merle King	
1437	1.2.2.7.1.2.2.2			NULL	Imprecise Section 2.2.7.1.2.2.2.1- The ATI of the Acc-VS shall provide the same capabilities to vote and cast a ballot as are provided by the other voting stations or by the visual interface of the Acc-VS. The term "same capabilities" is very broad	Accepted	Merle King	
1439	1.2.2.7.1.2.2.2.1			NULL	Comment: Reference to a 3.5 mm stereo headphone jack should allow for other commonly available jack sizes such as 1/8 inch. Previous section does say that ALL accessibility equipment must be supported - and that adaptors are allowed.	Accepted	Merle King	
1602	1.2.2.7.1.2.2.3	19-Feb	12-Sep	NULL	Recommended	Accepted	Merle King	

Section Comments Sorted by Section Number

521	1.2.2.7.1.2.2.3.4			NULL	OTHER ISSUES In addition to these three major accessibility issues, a number of standards in the VVSG continue to utilize "should" instead of "shall", including: Sanitized headphones (2.2.7.1.2.2.3.4)	Accepted	Merle King	
1443	1.2.2.7.1.2.2.3.4			NULL	Imprecise Section 2.2.7.1.2.2.3.4 - A sanitized headphone or handset should be made available to each voter. This is stated in terms of a jurisdiction procedure and not a requirement of the voting system. The requirement should be in terms of defining measure. Are you referring to 40 - 50 dB SPL or something else??	Accepted	Merle King	
1010	1.2.2.7.1.2.2.3.5			NULL	Revise 2.2.7.1.2.2.3.6 The voting station shall provide a volume control with adjustable audio output from a minimum of 20 dB SPL to a maximum of 105 dB SPL in increments no greater than 20 dB SPL. Explanation: The term amplification usually refers to	Accepted	Merle King	
1011	1.2.2.7.1.2.2.3.6			NULL	OTHER ISSUES In addition to these three major accessibility issues, a number of standards in the VVSG continue to utilize "should" instead of "shall", including: Capacity to provide digitized (human) speech versus synthesized speech (2.2.7.1.2.2.3.8)	Accepted	Merle King	
522	1.2.2.7.1.2.2.3.8			NULL	OTHER ISSUES In addition to these three major accessibility issues, a number of standards in the VVSG continue to utilize "should" instead of "shall", including: Voter ability to adjust speed of speech (2.2.7.1.2.2.3.9)	Accepted	Merle King	
523	1.2.2.7.1.2.2.3.9			NULL	No Acceptance Criteria or Not Testable • Section 2.2.7.1.2.2.3.9: The audio system should allow voters to control, within reasonable limits, the rate of speech. "Within reasonable limits" is not a testable term. The limit must be defined. [Staten	Accepted	Merle King	
1433	1.2.2.7.1.2.2.3	21-Feb		9 NULL	Comment: "The audio system should allow voters to control, within reasonable limits, the rate of speech." Recommended change: This requirement should be removed from the standard. Rationale: Requirement is excessive in that human speech ("p	Accepted	Merle King	
1603	1.2.2.7.1.2.2.3	21-Feb	10-Sep	NULL	2.2.6 If the normal procedure includes VVPAT, the Acc-VS should provide features that enable voters who are blind to perform this verification. If a state requires the paper record produced by the VVPAT to be the official ballot, then the Acc-VS shall p	Accepted	Merle King	
738	1.2.2.7.1.2.2.6	22		1 NULL		Accepted	Merle King	

Section Comments Sorted by Section Number

511	1.2.2.7.1.2.2.6	22	3	NULL	Current Standard 2.2.7.1.2.2.6 – If the normal procedure includes VVPAT, the Acc-VS should provide features that enable voters who are blind to perform this verification. If a state requires the paper record produced by the VVPAT to be the official ballot	Accepted	Merle King	
516	1.2.2.7.1.2.2.6			NULL	Move/change 2.2.7.1.2.2.6 to apply to all visually impaired voters and revise to read: "If the normal procedure includes a paper ballot which is or can be the official vote record, the Acc-VS shall provide features that enable visually impaired voters to Blind Voters Comparable to low vision voters, I would hope the end goal for blind voters is to ensure that the audio tactile interface (ATI) provides access to all votes cast, including a VVPAT vote. Unfortunately, standard 2.2.7.1.2.2.6 only says that	Accepted	Merle King	
1009	1.2.2.7.1.2.2.6			NULL	Volume 1 Section 2B Some references are in inches and feet, others use inches, and the metric system. How about added metric numbers to all requirements? P 2-22/25 Since some have both inches and metric (cm), shouldn't all reference both systems?	Accepted	Merle King	
623	1.2.2.7.1.3	22-25		NULL	Imprecise Section 2.2.7.1.3 For literate voters, the ALVS shall provide printed or displayed instructions, messages, and ballots in their preferred language, consistent with state and Federal law. General references to state and Federal law are too	Accepted	Merle King	
1442	1.2.2.7.1.3			NULL	Voters with Motor Limitations While standard 2.2.7.1.3.3 is only a should, it is still oddly focused on one particular type of alternative input device "sip and puff". It would be much more appropriate to refer to single switch input devices or some of OTHER ISSUES In addition to these three major accessibility issues, a number of standards in the VVSG continue to utilize "should" instead of "shall", including: Capacity to provide dual switch input (2.2.7.1.3.4)	Accepted	Merle King	
524	1.2.2.7.1.3.4			NULL	3.4 The Acc-VS should provide a mechanism to enable non-manual input that is functionally equivalent to tactile input. The EAC should amend this language to require accessibility for individuals with disabilities. This can be accomplished by changing	Accepted	Merle King	
739	1.2.2.7.1.3.4	23	21	NULL		Accepted	Merle King	

Section Comments Sorted by Section Number

517	1.2.2.7.1.3.5			NULL	ISSUE 2: ENSURE EQUAL ACCESS TO THE PAPER VOTING PROCESS Current Standard 2.2.7.1.3.5 –If the normal procedure is for voters to submit their own ballots, then the voting process should provide features that enable voters who lack fine motor control or	Accepted	Merle King	
740	1.2.2.7.1.3.5	24		1 NULL	3.5 If the normal procedure is for voters to submit their own ballots, then the Acc-VS should provide features that enable voters who lack fine motor control or the use of their hands to perform this submission. The EAC should amend this language to re	Accepted	Merle King	
1067	1.2.2.7.1.3.5	24-Feb		2 NULL	Standard 2.2.7.1.3.5- If the normal procedure is for voters to submit their own ballot, then the voting process should provide features that enable voters who lack fine motor control or the use of their hands to perform this submission. (Page 2-24, line	Accepted	Merle King	
442	1.2.2.7.1.4	24-Feb		5 NULL	4. The voting booth itself should be fashioned in such a way that an individual who requires a personal attendant for voting can have room for the personal attendant in the voting booth. A parallel approach will be impossible for many wheelchair users who	Accepted	Merle King	
624	1.2.2.7.1.5	27-29		NULL	[Note* charts actually on p. 29] Charts should also have metric measurements, p.2-27/28	Accepted	Merle King	
443	1.2.2.7.1.7	28-Feb		22 NULL	7. The synchronization of words and voice will be helpful to those with cognitive disabilities. Many of those individuals have the ability to make a decision, but have not been taught to read because of the difficulty level in doing so and stereotypical th	Accepted	Merle King	
990	1.2.2.7.1.7	2-12 [13]		NULL	April 21, 2005 The National Association of Protection and Advocacy Systems (NAPAS) would like to provide a few initial comments regarding Version 1 of the Voluntary Voting System Guidelines for the TGDC's consideration at its April 20-21 hearing.	Accepted	Merle King	
991	1.2.2.7.1.7	2-26 [28]		NULL	COMMENT 2: Section Two: Functional Capabilities (2B), p. 2-26 [alternatively, p. 2-28] 2.2.7.1.7 should be modified to read as follows or using similar language that ensures the inclusion of all voters with mental disabilities: "2.2.7.1.7 The vo	Accepted	Merle King	
437	1.2.2.7.2.1.2	14-Feb		23 NULL	With respect to 2.1.1, you state print size in terms of mm. It would be more helpful to state the print size in terms of points, since many visually impaired individuals are accustomed to using point selection of fonts in computer use. For example, my da	Accepted	Merle King	

Section Comments Sorted by Section Number

1606	1.2.2.7.2.2	Feb-31	4-Jan	NULL	Comment: Transliteration should not be required. It should be chosen by local election officials based on the needs of the local voter population. In some cases transliteration is an incumbence, not an aid. Recommended change: Remove requiremen	Accepted	Merle King	
440	1.2.2.7.2.3.9	21-Feb	9	NULL	2.2.3.9: I agree it is very important to have speed control. For my daughter, for example, it would be necessary to slow the speed of the speech, as well as to have a good repetition device.	Accepted	Merle King	
2155	1.2.2.7.2.2.6	22-Feb	1	NULL	In Section 2.2.7 Human Factors, there is a requirement 2.2.6 which says if a state requires the paper record to be the official ballot then a visually impaired voter must be able to review the paper record. Since this is one of the more significant standar	Accepted	Merle King	
441	1.2.2.7.2.2.7	22-Feb	11	NULL	2.2.7: The best way to allow disabled voters to cast their vote would ordinarily be touch-screen. The touch-screen can be set to announce the identity of the key. There are many products on the market for the myriad of disabled computer users who have enj	Accepted	Merle King	
1607	1.2.2.7.2.3.1	Feb-31	14-Dec	NULL	Comment: Even though the usability testing described in this section is only "recommended" and not required, caution should be used when considering placing anything like this in a standard. It will become a defacto standard, despite the lesser in	Accepted	Merle King	
1393	1.2.2.7.2.4	Feb-31	22	NULL	Human Factors: Volume 1, Section 2.2.7- Informal Gap Analysis In looking at the changes to section 2.2.7 we see a number of new and changed requirements. Section: 2.2.7.2.4, and 2.2.7.2.5.4.1 Audio: • The 2002 VSS did not identify specific deci	Accepted	Merle King	
1396	1.2.2.7.2.4			NULL	Human Factors: Volume 1, Section 2.2.7- Informal Gap Analysis In looking at the changes to section 2.2.7 we see a number of new and changed requirements. Section: 2.2.7.2.4, and 2.2.7.2.5.4.1 Audio: • The 2002 VSS did not identify specific freq	Accepted	Merle King	
1399	1.2.2.7.2.4			NULL	Human Factors: Volume 1, Section 2.2.7- Informal Gap Analysis In looking at the changes to section 2.2.7 we see a number of new and changed requirements. Section: 2.2.7.2.4, and 2.2.7.2.5.4.1 Audio: • The 2002 VSS did not stipulate the use of	Accepted	Merle King	

Section Comments Sorted by Section Number

1401	1.2.2.7.2.4	Feb-31	NULL	Human Factors: Volume 1, Section 2.2.7- Informal Gap Analysis In looking at the changes to section 2.2.7 we see a number of new and changed requirements. Section: 2.2.7.2.4, and 2.2.7.2.5.4.1 Audio: The 2002 VSS did not stipulate that voter	Accepted	Merle King	
1402	1.2.2.7.2.4		NULL	Human Factors: Volume 1, Section 2.2.7- Informal Gap Analysis In looking at the changes to section 2.2.7 we see a number of new and changed requirements. Section: 2.2.7.2.4, and 2.2.7.2.5.4.1 Controls: • The 2002 VSS did not stipulate	Accepted	Merle King	
1408	1.2.2.7.2.4		NULL	Human Factors: Volume 1, Section 2.2.7- Informal Gap Analysis In looking at the changes to section 2.2.7 we see a number of new and changed requirements. Section: 2.2.7.2.4, and 2.2.7.2.5.4.1 Controls: The 2002 VSS did not stipulate	Accepted	Merle King	
1411	1.2.2.7.2.4		NULL	Human Factors: Volume 1, Section 2.2.7- Informal Gap Analysis In looking at the changes to section 2.2.7 we see a number of new and changed requirements. Section: 2.2.7.2.4, and 2.2.7.2.5.4.1 Controls: The 2002 VSS did not stipulate	Accepted	Merle King	
1414	1.2.2.7.2.4		NULL	Human Factors: Volume 1, Section 2.2.7- Informal Gap Analysis In looking at the changes to section 2.2.7 we see a number of new and changed requirements. Section: 2.2.7.2.4, and 2.2.7.2.5.4.1 Controls: The 2002 VSS did not stipulate	Accepted	Merle King	
1416	1.2.2.7.2.4		NULL	Human Factors: Volume 1, Section 2.2.7- Informal Gap Analysis In looking at the changes to section 2.2.7 we see a number of new and changed requirements. Section: 2.2.7.2.4, and 2.2.7.2.5.4.1 Controls: • As the 2002 VSS does not stipulate	Accepted	Merle King	
1419	1.2.2.7.2.4		NULL	Human Factors: Volume 1, Section 2.2.7- Informal Gap Analysis In looking at the changes to section 2.2.7 we see a number of new and changed requirements. Section: 2.2.7.2.4, and 2.2.7.2.5.4.1 Controls: The VSSG requirements regarding	Accepted	Merle King	
1422	1.2.2.7.2.4		NULL	Human Factors: Volume 1, Section 2.2.7- Informal Gap Analysis In looking at the changes to section 2.2.7 we see a number of new and changed requirements. Section: 2.2.7.2.4, and 2.2.7.2.5.4.1 Visual - Hearing Impaired: • The 2002 VSS d	Accepted	Merle King	

Section Comments Sorted by Section Number

1424	1.2.2.7.2.4			NULL	Human Factors: Volume 1, Section 2.2.7- Informal Gap Analysis In looking at the changes to section 2.2.7 we see a number of new and changed requirements. Section: 2.2.7.2.4, and 2.2.7.2.5.4.1 Visual – Sight Impairments: • The 2002 VSS	Accepted	Merle King	
1425	1.2.2.7.2.4			NULL	Human Factors: Volume 1, Section 2.2.7- Informal Gap Analysis In looking at the changes to section 2.2.7 we see a number of new and changed requirements. Section: 2.2.7.2.4, and 2.2.7.2.5.4.1 Visual – Sight Impairments: • The 2002 VS	Accepted	Merle King	
1426	1.2.2.7.2.4			NULL	Human Factors: Volume 1, Section 2.2.7- Informal Gap Analysis In looking at the changes to section 2.2.7 we see a number of new and changed requirements. Section: 2.2.7.2.4, and 2.2.7.2.5.4.1 Visual – Sight Impairments: • The 2002 VS	Accepted	Merle King	
1427	1.2.2.7.2.4			NULL	Human Factors: Volume 1, Section 2.2.7- Informal Gap Analysis In looking at the changes to section 2.2.7 we see a number of new and changed requirements. Section: 2.2.7.2.4, and 2.2.7.2.5.4.1 Visual – Sight Impairments: • The 2002 VS	Accepted	Merle King	
1923	1.2.2.7.3	Feb-34		NULL	140-1 Comments: Vol I, Section 2.2.7 (3) page 2- 34 "technical complexity and costs of a large set of detailed requirements may not be justified" Recommended change: These are the places in the VVSG where the expense of voting system testing is	NULL	NULL	
2043	1.2.2.7.3	Feb-34		NULL	140a G All All All Cost: Vol I, Section 2.2.7 (3) page 2- 34 "technical complexity and costs of a large set of detailed requirements may not be justified" These are the places in the VVSG where the expense of voting system testing is mentioned	Accepted	Merle King	
1610	1.2.2.7.3.2.5	Feb-36	17-21	NULL	Comment: "... navigation controls that allow the voter to advance to the next race or go back to the previous race ..." Recommended change: This requirement should be removed from the standard. Rationale: The statement is an implementation not a	Accepted	Merle King	
1612	1.2.2.7.3.3.5	Feb-39	5-Jan	NULL	Comment: "The use of color by the voting system should agree with common conventions." Recommended change: This requirement should be removed from the standard. Rationale: If there is a specific user interface standard required, it should b	Accepted	Merle King	
345	1.2.2.7.3.5	Feb-39		NULL	a. Recommend referencing paragraph 2.17 because color cannot convey severity to a blind voter.	Accepted	Carol Paquette	

Section Comments Sorted by Section Number

340	1.2.2.7.4	Feb-42	13, 14	NULL	2. Paragraph with "forbids the issuance of a receipt to the voter" should be rewritten. Volume 1, Pg 2-42; lines 13 and 14 read: "Among other practices, this forbids the issuance of a receipt to the voter that would provide proof to another how he or s	Accepted	Carol Paquette	
343	1.2.2.7.4.1.1	Feb-42	25, 26	NULL	5- On page 2-42; lines 25 and 26 read as follows: "2.2.7.4.1.1 The ballot and input controls shall be visible only to the voter during the voting session and ballot submission". Rationale: Being visible only to the voter is not sufficient as it doesn't	Accepted	Carol Paquette	
344	1.2.2.7.4.1.2	Feb-42	29	NULL	6- On page 2-42; lines 29 reads as follow: "2.2.7.4.1.2 The audio interface shall be audible only to the voter". Rationale: Being audible only to the voter is not sufficient as it doesn't fully comply with HAVA because it does not preclude the voter f	Accepted	Carol Paquette	
518	1.2.2.7.4.2.1	Feb-44	10	NULL	ISSUE 3: ENSURE PRIVACY OF PAPER BALLOTS Current Standard 2.2.7.4.2.1 -- No information shall be kept within a non-paper-based Cast Vote Record that identifies any accessibility feature(s) used by a voter. (Page 2-44, line 10)	Accepted	Merle King	
625	1.2.2.7.5	41	16	NULL	[*Note actually 5.4.1] Page 2-41 (5.1.4.); again using inches, should we include metric numbers also?	Accepted	Merle King	
626	1.2.3.3	Feb-53		NULL	Vol 1 Sect 2C [Note* Actually section 2.3.3] 2.2.1 Readiness Testing Election personnel conduct equipment and system readiness tests prior to the start of an election to ensure that the voting system functions properly, to confirm that system equi	Accepted	Merle King	
627	1.2.4.1.2.1	Feb-56		NULL	[Note* Actually section 2.4.1.2.1] 2.4.1.1.1 All Paper-Based Systems All of a sudden the font size changes here.....	Accepted	Merle King	
628	1.2.4.3.1	Feb-58		NULL	[Note* Actually section 2.4.3.1] 2.4.1.2 Common Requirements To facilitate casting a ballot, all systems shall: a. Provide text that is at least 3 millimeters high and provide the capability to adjust or magnify the text to an apparent size of 6.3 mil	Accepted	Merle King	
629	1.2.4.3.2.1	Feb-58		NULL	[Note* Actually section 2.4.3.2.1 2.4.1.2.1 All Paper-Based Systems All paper-based systems shall: a. Allow the voter to easily identify the voting field that is associated with each candidate or ballot measure response; b. Allow the voter to punch o	Accepted	Merle King	

Section Comments Sorted by Section Number

630	1.2.5.2	Feb-61		NULL	[Note* Actually section 2.5.2] 2.4.2 Consolidating Vote Data All systems shall provide a means to consolidate vote data from all polling places, and optionally from other sources such as absentee ballots, provisional ballots, and voted ballots require	Accepted	Merle King	
631	1.2.5.3	s-61		NULL	[Note* Actually section 2.5.3] 2.4.3 Producing Reports All systems shall be able to create reports summarizing the data on multiple levels.	Accepted	Merle King	
632	1.2.5.3.1	Feb-61		NULL	[Note* Actually section 2.5.3.1] 2.4.3.1 Common Requirements (note: my copy is showing some of the titles in bold, some in regular type—please check this out) Common requirements were not bold on my copy, but 2.4.2 and 2.4.3 were 2.5.3.2. isn't bo	Accepted	Merle King	
1614	1.2.6	Feb-62		NULL	Comment: Section on maintenance, transportation and storage is out of place in Vol I, section 2. Recommended change: This information should be in Vol I, section 3 (Hardware). Rationale: Hardware standards should be in the hardware section.	Accepted	Merle King	
438	1.2.7.2.2.2.2	19-Feb	7	NULL	2.2.2.2: Repetition is essential. It will be key for the machine to identify the context of the repetition to make it meaningful. 2.2.3.1: In addition to providing for headphone use, it's very important to have a telephone-type device for those whose disabilities do not permit them to use earphones or headphones. I think it would also be important to have sound that is not muffled	Accepted	Merle King	
439	1.2.7.2.2.3.1	19-Feb	9	NULL	The error rate numbers and means to test these need to be elaborated. It is most unclear as to what method can demonstrate 10,000,000 voting events in testing, or 500,000 events and why a single error at one level equates to one error at the higher level.	Accepted	Merle King	
262	1.3		4	see except NULL		Accepted	test1	
633	1.3	i-iii		NULL	Volume I, Section 3 T o C is okay 3.2.2.1, 3.2.2.2, etc. (titles) These are not in bold as the previous sections—typo error Or are you only putting in bold the major topics?	Accepted	Merle King	
634	1.3	5		NULL	Page 3-6 a. All systems shall also be capable of operating for a period of at least 2 hours on backup power, such that no voting data is lost or corrupted, nor normal operations interrupted. When backup power is exhausted the system shall retain the	Accepted	Merle King	
635	1.3	6	2	NULL	cont	Accepted	Merle King	

Section Comments Sorted by Section Number

1615	1.3.2.2.8	7-Mar	NULL	Comment: ... without human intervention... Recommended change: Clarify (just as the other stipulation in this section is clarified) that this does NOT include input of passwords or other security activity. Rationale: Doesn't make sense with curren	Accepted	Merle King	
1616	1.3.2.2.8		NULL	Comment: 15KV ESD Recommended change: Change to 8KV discharge. Rationale: This is far more than is needed to ensure voting system reliability.	Accepted	Merle King	
643	1.3.2.3.1	9	NULL	3-9, section 3.2.3.1 Should there be something included about error messages, such as "PIN required to open device"? Reason I'm asking is that the DRES used in MS had a problem because one of the techs inadvertently added a PIN requirement and it took ho	Accepted	Merle King	
1617	1.3.2.3.2	9-Mar	NULL	Comment: 22 month "demonstrated" data retention Recommended change: Clarify how to demonstrate. Rationale: No industry standard tests exist.	Accepted	Merle King	
636	1.3.2.4.2.3	11	NULL	[Note* Actually section 3.2.4.2.3] 1.1.1.2 Marking Devices The Technical Data Package shall specify marking devices (such as pens or pencils) that, if used to make the prescribed form of mark, produce readable marked ballots such that the system meets	Accepted	Merle King	
637	1.3.2.4.2.4	11	NULL	[Note* Actually section 3.2.4.2.4] 1.1.1.3 Frames or Fixtures for Punchcard Ballots The frame or fixture for punchcards shall: a. Hold the ballot card securely in its proper location and orientation for voting. b. When contests are not printed direct	Accepted	Merle King	
1618	1.3.2.4.2.6	12-Mar	NULL	Comment: "separate compartments for the segregation ... " of ballots in precinct count systems Recommended change: delete or clarify to allow for nonsegregation if system otherwise manages the special situation Rationale: The statement is an imple	Accepted	Merle King	
638	1.3.2.4.3.2	13	NULL	[Note* Actually section 3.2.4.3.2] 1.1.1.4 DRE System Vote Recording To ensure vote recording accuracy and integrity while protecting the anonymity of the voter, all DRE systems shall: a. Contain all mechanical, electromechanical, and electronic compo	Accepted	Merle King	
639	1.3.2.5.2	19	NULL	p. 3-17 [Note* Actually bullet point c.] a. Reject ballots that meet all vendor specifications at a rate not to exceed 2 percent. (isn't this too high a rate?)	Accepted	Merle King	
640	1.3.2.8	20	NULL	[Note* Actually page 3-20] 3-19 3.2.8 data management Shouldn't provisional ballots be addressed here also along with absentee?	Accepted	Merle King	

Section Comments Sorted by Section Number

1376	1.3.22.1			NULL	Appendix D: D.1.1 (your webpage form would not accept this section number). The concept of "independent dual verification", verifying one electronic record with another electronic record, will do nothing to ensure honest elections. Auditing elections with	NULL	NULL	
2063	1.3.4.3	22-Mar		NULL	Continuation of MTBF comment. The failure rate includes both observable and unobservable failures. The VWSG specifies that a failure is any loss of function or any performance degradation lasting more than 10 seconds. The 10second boundary places mis	Accepted	Merle King	
2062	1.3.4.3	22-Mar		comments-to	RELIABILITY Mean time between failures (MTBF) Section 3.4.3 of the VWSG specifies a "Mean Time Between Failures" of 163 hours. This provision first appeared in the 1990 FEC standard and was carried into the 2002 update of that standard. Based on the us	Accepted	Merle King	
641	1.3.4.5	24		NULL	[Note* Actually bullet point a] 3-24 3.4.5. c a. For all DRE systems, recording and storing the voter's ballot selections. (should this be "voters' ballot selections—aren't we storing more than one voters' selections?)	Accepted	Merle King	
642	1.3.4.5	24		NULL	3-24 The voting system shall achieve ** at least ninety-nine percent ** availability during normal operation for the functions indicated above. This standard encompasses for each [Note* comment text marked in red shown marked with ** ** because color c	Accepted	Merle King	
1619	1.4	2-Apr	4.1.1	NULL	Comment: "Unmodified software is not subject to code examination; however, source code generated by a package and embedded in software modules for compilation or interpretation shall be provided in human readable form to the ITA." Recommended change:	Accepted	Merle King	
2054	1.4	6-Apr	4.2.5.c	NULL	3014 p 4-6 4.2.5.c All single-character names are forbidden except for variables used as loop indexes. All single-character names should be avoided and only used where software programming conventions dictate. Examples of such conventions in	Accepted	Merle King	
644	1.4.1.2	2		NULL	Vol 1 Sect 4 4.1.2 "If" in the title should be capitalized	Accepted	Merle King	
1620	1.4.2.3	5-Apr		NULL	Comment: "Each module shall have a single entry point, and a single exit point..." Recommended change: "Separate return(s) shall be allowed to exit the module upon error conditions if appropriately commented." Rationale: Allowing for more than	Accepted	Merle King	

Section Comments Sorted by Section Number

1621	1.4.2.4	6-Apr		NULL	Comment: (Addition) Recommended change: "e. An if-elseif control construct shall not require a terminating else block if not required by program logic. Rationale: ITA reviewers are requiring source code changes to insert a do-nothing else block 4.2.5.c Comment: "Names shall differ by more than a single character." Recommended change: "Names shall differ by more than a single character where practical and does not impede the readability or intelligibility as required by paragraph 4.2.	Accepted	Merle King	
1622	1.4.2.5	6-Apr		NULL	Comment: Proposed addition: Insert a new paragraph "b" and move existing "b" to "c". The new paragraph "b" reads as follows: Recommended change: b. The vendors shall provide internal documentation that defines the software coding standards used	Accepted	Merle King	
1623	1.4.2.6	7-Apr		NULL	4.2.7. d spacing error "comments such", p. 4-8 Assembly code shall contain descriptive and informative comments such that its executable lines can be clearly understood; and 4.2.7.a. Comment: All modules shall contain headers... Recommended change: All modules shall contain common headers containing comments that enhance the understanding and readability of the module if the function of the module is not readily a	Accepted	Merle King	
645	1.4.2.7	8		NULL	4.2.7.b Comment: Descriptive comments shall be provided to identify objects and data types. All variables shall have comments at the point of declaration clearly explaining their use. Recommended change: Objects, data types, and variables shall be provided	Accepted	Merle King	
1624	1.4.2.7	7-Apr		NULL	p. 4-8 1.2 Pre-election Audit Records During election definition and ballot preparation,, the system shall audit the (double comma between preparation and the)	Accepted	Merle King	
1625	1.4.2.7	7-Apr		NULL	My comments can also be found at http://home.tiac.net/~rjf/Computers-and-Elections.html	Accepted	Merle King	
646	1.4.4.1	8		NULL	Change "qualification" to "certification" Nature of Change: Deprecated term	Accepted	Merle King	
1159	1.5			generic Hear		Accepted	Merle King	
529	1.5.1	6-Jan		11 NULL	Replace the Voting System definition text found on page 1-6 with the following HAVA definition of Voting System. The total combination of mechanical, electromechanical, or electronic equipment (including the software, firmware, and documentation required	Accepted	Merle King	
537	1.5.1	6-Jan		NULL		Accepted	Merle King	

Section Comments Sorted by Section Number

1594	1.5.1	6-Jan 20-21	NULL	Comment: Does this statement apply to all voting systems, or only those voting systems with "technologies not addressed in the Guidelines", as this is the context provided in the preceding paragraph? Recommended change: Clarify the sentence and its ap	Accepted	Merle King	
647	1.5.1.2	3	NULL	Vol 1, Sect 5 P. 5-3 • Components acquired by others (such as school systems, libraries, military installations and other public organizations) that are used at settings supervised by election officials, including minimum configuration components req	Accepted	Merle King	
648	1.5.2.7	6	NULL	p. 5-6, 5.2.7. numbering system error should be a. and b. not c. d. as listed sorry, my system won't highlight the "a & b" Confirmation occurs when the system notifies the user of the successful or unsuccessful completion of the data transmission, w	Accepted	Merle King	
1748	1.5.4	7-Jan 23-27	NULL	This paragraph references protection against automated fraud and manipulation of votes, but voting technology needs to protect against both automated and manual attempts at fraud. We suggest deleting the reference to "automated" fraud so the section appli	Accepted	Merle King	
963	1.5.1.1	6-Jan 11	NULL	Current: and defects, and determine specific changes made after system qualification. Change: and defects, and determine specific changes made after system certification. Nature of change: Deprecated term	Accepted	Merle King	
458	1.6		Scytl Comm	Dear Sirs, I'm sending you a document with Scytl's comments to the currently published VVSG Guidelines. The document summarizes Scytl's Guidelines comments which focus on the security section (Volume I, Section 6), the appendix that describes	Accepted	Merle King	
649	1.6	1	NULL	Why is the font on the T o C italicized? Not in other sets where it's bold. Page numbering is different also. Have had section-page as in 3-7, here it's only the page number. Font is also different. Dots between listing and page number vary too	Accepted	Merle King	
2182	1.6		NULL	The proposed voting system standards, Section 6.0 "Security" call for the use of the Advanced Encryption Standard, or Federal Information Processing Standard 197. Previous encryption standards for wireless relied on the Digital Encryption Standard know	Accepted	Merle King	

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992	1.6.0.1.1.1	6-33 [41]		NULL	COMMENT 3: Section Six: Security (6A), p. 6-33 [alternatively, p. 6-41] In order to be consistent with HAVA's mandate that voting be accessible to voters with disabilities, not just those who are blind, 6.0.1.1.1 should be modified to read: "6.0.1	Accepted	Merle King	
993	1.6.0.2.4.6			NULL	April 21, 2005 Dr. Williams, Regarding 6.0.2.4.6 and 6.0.2.4.6.1: In yesterday's committee meeting you proposed that these be removed, because they can't be done. As you pointed out, once the ballot is cast, it is cast, anonymity requirements	Accepted	Merle King	
650	1.6.1	3		NULL	Page 6-3, formatting and spacing is not consistent with other sections There must have been a different person entering the data on this section Someone needs to take this entire section and standardize it with the other sections The spacing between	Accepted	Merle King	
1595	1.6.1	9-Jan	11-Oct	NULL	Comment: This sentence suggests that it would be feasible to certify an "individual system component or element". Is this accurate? Recommended change: If this is the intent of the statement, then no change is recommended. If it is the intent of the	Accepted	Merle King	
1750	1.6.1	9-Jan	20-25	NULL	This section states that the Certification Number applies to the system as a whole and not to individual components. It is important to require the end-to-end system testing discussed here, but it would also be useful to have separate qualification number	Accepted	Merle King	
1752	1.6.1	9-Jan	26-33	NULL	It would be helpful if the VWSG expanded on the process used to evaluate minor changes. Currently, there is not an adequate process in place to allow for an expedited review of minor changes required to address changes in state law, changes required as th	Accepted	Merle King	
2159	1.6.1			NULL	Below is a table with reference to where some of the points we have raised should be addressed in The Guidelines. It also raises additional questions and points. Because we've called on the EAC to broaden its scope, this table cannot be complete as numerou	Accepted	Merle King	
651	1.6.1.1	4		NULL	Page 4 Should VVPAT be mandated nationally? I thought it had been. (this references the last bullet where VVPAT isn't mandatory)	Accepted	Merle King	
652	1.6.1.2	4		NULL	6.1.1 Location and Control of Software and Hardware on Which It Operates ("It" should be capitalized in the title above and T o C)	Accepted	Merle King	

Section Comments Sorted by Section Number

653	1.6.1.3	4	NULL	6.1.3 spacing not aligned as other sections, needs to be indented The requirements of this section apply to the capabilities of a voting system provided by the vendor. The ** Guidelines recognizes ** that effective security requires safeguards beyond t	Accepted	Merle King	
654	1.6.1.4	5	NULL	Page 5 • Equipment and Data Security: These standards address physical security measures and procedures that prevent disruption of the voting process at the poll site ** /polling place ** and corruption of voting data. (other sections refer poll site	Accepted	Merle King	
656	1.6.2	6	NULL	Page 6 Access controls may include physical controls, such as keeping computers in locked rooms to limit physical access, and technical controls, such as security software programs designed to prevent or detect unauthorized access to sensitive files. The	Accepted	Merle King	
655	1.6.2	6	NULL	Access controls may include physical controls, such as keeping computers in locked rooms to limit physical access, and technical controls, such as security software programs designed ** to prevent and or detect ** unauthorized access to sensitive files. T	Accepted	Merle King	
1754	1.6.2	10-Jan	NULL	We agree with the advice to states in lines 20-23 that state certification ought to focus on state functional requirements rather than a duplication of federal testing processes. Failure to adopt this model will continue to add costs and delays to the imp	Accepted	Merle King	
1627	1.6.2.2	6	NULL	Comment: Individual Access Privileges Recommended change: a. and b. The draft standard refers to "persons" and "individuals". The reference should be to "access levels". Rationale: System design vs. managed list of authorized users 1.6.2.6 & 1.6.2.7 Comment: turn off the wireless capabilities and not enabling them without interaction from a voting official. Recommended change: recommend removing these requirements Rationale: The standards should dictate this part of	Accepted	Merle King	
1643	1.6.2.6	29	NULL	Comment: The draft standard requires the vendor to "develop and provide detailed documentation of measures to anticipate and counteract vandalism, civil disobedience, and similar occurrences". Recommended change: This requirement should be stru	Accepted	Merle King	
1628	1.6.3.2	8	NULL	Page 8 6.4.1. Spacing error before subsection a, b, etc. Also, still using commas instead of ; between sections	Accepted	Merle King	
657	1.6.4.1	8	NULL	Inconsistent in this section	Accepted	Merle King	

Section Comments Sorted by Section Number

1629	1.6.4.1	8	NULL	6.4.1a Comment: "The vendor shall require and state in the system documentation that every device is to be retested to validate each ROM prior to the start of elections operations." Recommended change: This requirement should be struck from	Accepted	Merle King	
1635	1.6.4.2	18	7-Mar NULL	Comment: The draft standard requires that "there is no unauthorized software [on the voting system equipment]. Recommended change: This requirement should be changed to "list the unauthorized software [on the voting system equipment]" Rationale	Accepted	Merle King	
1630	1.6.4.4.1	10	11 NULL	Comment: The draft standard requires a "unique identifier" Recommended change: This requirement should be struck from the standard; alternatively replace "serial number" with "part number" Rationale: serializing the documentation provides n	Accepted	Merle King	
373	1.6.4.4.11	13	6 NULL	Discussion: We believe that other sections of the V/SG make clear that this section is not intended to require vendors to provide copies of source code of third party software. However, we do not believe that this is unambiguous, since the Glossary ment	Accepted	Carol Paquette	
374	1.6.4.4.11		NULL	It is generally impractical or impossible to provide the software requested by § 6.4.4.11, except as copies of the hardware in which the software exists. Reference: Glossary: "Voting System Software: All the executable code and associated configuration	Accepted	Carol Paquette	
382	1.6.4.4.12	13	11 NULL	d. Recommend adding a discussion paragraph to this section discussing potential licensing issues.	Accepted	Carol Paquette	
1631	1.6.4.4.12	13	15-Nov NULL	Comment: The draft standard requires that "all voting system software ... (such as operating systems...) ... shall be distributed on a write-once media". Recommended change: The requirement to include COTS software on the writeonce media should be stru	Accepted	Merle King	
1632	1.6.4.4.13	13	20-27 NULL	1.6.4.4.13 & 1.6.4.4.14 Comment: The draft standard refers to "reference information produced by the NSRL or other EAC designated repository..." Recommended change: This requirement cannot be released as written Rationale: the term "reference	Accepted	Merle King	
658	1.6.4.4.2		NULL	Page 10 However, the specific time or value of the change in the dynamic software is usually unknown a priori making it impossible to create reference information to verify the software. The above isn't making sense "a priori" (I may just not know	Accepted	Merle King	

Section Comments Sorted by Section Number

1634	1.6.4.6.1	17	31-32	NULL	Comment: The draft standard states that "Setup validation methods shall verify that no unauthorized software is present on the voting equipment". Recommended change: This requirement should be struck from the standard Rationale: it is redundant	Accepted	Merle King	
1636	1.6.4.6.3	18-19		NULL	Comment: This section of the draft standard must be completely redone because as written it is unworkable in the field. Especially 6.4.6.3.4 "Voting system equipment shall provide a read-only external interface to access the software on the system"	Accepted	Merle King	
1637	1.6.4.6.4	20		NULL	Comment: The draft standard requires that "Setup validation methods shall verify that registers and variables of the voting system equipment contain the proper static and initial values". Recommended change: This requirement, and its subrequireme	Accepted	Merle King	
660	1.6.5	20	18	NULL	Page 20: 6.5 Do you want a space before the bullet points?	Accepted	Merle King	
1638	1.6.5.2	21		NULL	Comment: The draft standard requires that "voting systems that use telecommunications ... shall implement an encryption standard ... and provide a means to detect the presence of an intrusive process..." Recommended change: This section should be mod	Accepted	Merle King	
661	1.6.5.3	21	15	NULL	Also, 6.5.3, spacing before bullets?	Accepted	Merle King	
662	1.6.5.4.2	22, 23		NULL	6.5.4.2 spacing again 6.5.5.5 also 6.5.5.1 (in other words, several places in this section)	Accepted	Merle King	
383	1.6.5.4.2	21	5	NULL	e. Section 6.5.4.2 discusses protective software. Nowhere in the guidelines is there any discussion about protective hardware, e.g., firewalls, intrusion detection systems, etc. A system vendor could supply a third-party piece of hardware that would sati	Accepted	Carol Paquette	
1639	1.6.5.4.2	22		NULL	Comment: Use of Protective Software Recommended change: This section should be modified to place this requirement only on those telecommunications channels that transmit official election results Rationale: Channels carrying unofficial result	Accepted	Merle King	
663	1.6.5.4.3	23		NULL	Page 23, 6.5.4.3. (this is section e, but my system numbered it incorrectly for me) a. After implementation of the proposed response is approved by the state, assist clients, either directly or through detailed written procedures, how to update their sys	Accepted	Merle King	
664	1.6.5.4.3	23	7	NULL	No spacing after numbers for bullet points within point f.	Accepted	Merle King	

Section Comments Sorted by Section Number

1640	1.6.6	24-25	NULL	Comment: Security for Transmission of Official Data Over Public Communications Networks Recommended change: Every subsection should specifically state that the requirement applies to the transmission of Official Election Return data Rationale	Accepted	Merle King	
384	1.6.6.1	24	14 NULL	f. Although the wireless section includes encryption of all data transmitted, transmission over the public network does not. Recommend adding this as a requirement to ensure data integrity during transmission. Digital signatures, in and of themselves, do	Accepted	Carol Paquette	
1641	1.6.7	25	NULL	Comment: The third paragraph in the opening introduction states that "the wireless communications path on which the signal travels is via the air". Recommended change: This should be reworded because it is inaccurate; the communications signal t	Accepted	Merle King	
2112	1.6.7		NULL	Guidelines look like they have been developed by a committee that didn't want to make the rules too tough on anyone. The Guidelines permit many methods of data transmission that are not secure or that can be made insecure quite easily and undecabl	Accepted	Merle King	
665	1.6.7.2.1.1		NULL	P 27 This documentation shall include: "P a complete description of the uses of wireless in the voting system including descriptions of the data elements and signals that are to be carried by the wireless mechanism, "P a complete descri	Accepted	Merle King	
2180	1.6.7.2.1.1	27	NULL	Briefly, I'd like to take a look at why jurisdictions decide to select a vendor solution that is based on wireless network technologies. According to the Discussion in Section 6.7.2.1.1, "convenience is not a sufficiently compelling reason, on its own,	Accepted	Merle King	
1453	1.6.7.2.1.3	28	NULL	Wireless Requirements: Imprecise 6.7.2.1.3: The wireless documentation shall be closely reviewed for accuracy, completeness, and correctness. What will the documentation be reviewed against? How are accuracy, completeness and correctness to be measur	Accepted	Merle King	
1454	1.6.7.2.1.3.1		NULL	Wireless Requirements Imprecise 6.7.2.1.3.1: This review shall be done either through an open and public review or by a subject area recognized expert. What are the acceptable qualifications of an expert? Clarification: There is no prohibition for	Accepted	Merle King	

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1642	1.6.7.2.3	28-29	NULL	1.6.7.2.3 & 1.6.7.2.4 & 1.6.7.2.5 Comment: States that "the voting system should be able to accomplish the same function if wireless capabilities are not available due to an error" Recommended change: Recommend eliminating the requirement.	Accepted	Merle King	
1688	1.6.7.4	31	NULL	51 Comments: Contains requirements about wireless data having to be encrypted. Recommend that these requirements apply only to wireless data whose corruption or modification would be unnoticed by the election official and/or voter. Rationale: Comment: Contains requirements about wireless data having to be encrypted. Recommended change: recommend that these requirements apply only to wireless data whose corruption or modification would be unnoticed by the election official and/or voter.	NULL	NULL	
1684	1.6.7.4	31	NULL	51 6.7.4.31 Contains requirements about wireless data having to be encrypted. recommend that these requirements apply only to wireless data whose corruption or modification would be unnoticed by the election official and/or voter. For exam	NULL	NULL	
1933	1.6.7.4	31	NULL		NULL	NULL	
666	1.6.7.4	31	9 NULL	P 31 Examples of ** non-specific ** election information that needs to be protected include: protocol messages, address or device identification information, and passwords. (should be hyphen as in non-specific) [Correction area marked in **]**	Accepted	Merle King	
1941	1.6.7.4	31	NULL	51 6.7.4.31 Contains requirements about wireless data having to be encrypted. recommend that these requirements apply only to wireless data whose corruption or modification would be unnoticed by the election official and/or voter. For exampl	Accepted	Merle King	
667	1.6.7.6.1	32	22 NULL	P 32 6.7.6.1; also 6.7.6.2 The voting system shall be able to function properly throughout a Should it be "must" Need to check usage of shall, must, should throughout this section	Accepted	Merle King	
1455	1.6.7.6.4		NULL	Wireless Requirements Imprecise 6.7.6.4: The wireless audible path shall be protected or shielded. Is there a precise wireless standard or level to test this to? [Statements submitted at EAC public hearing, June 30, 2005, New York]	Accepted	Merle King	

Section Comments Sorted by Section Number

1456	1.6.7.7.1			NULL	Wireless Requirements Imprecise 6.7.7.1: The shielding shall be strong enough to prevent escape of the voting system's signal, as well as strong enough to prevent infrared saturation jamming. Is there a precise wireless standard to test this to?	Accepted	Merle King	
356	1.6.8	36	9	NULL	The relevant section covering VVPAT is § 6.8 Requirements for Voter Verified Paper Audit Trail (Optional). That section, while voluntary, appears to cover any system that may print a voter verified audit trail or ballot ("This section contains requirements for VVPAT are intended to help states that have VVPAT laws. The risk in the way the VMSG is currently drafted is that states may have passed legislation prior to the EAC's adoption of the VMSG.	Accepted	Carol Paquette	
359	1.6.8			NULL	Subject: paper trail for voting I want Section 6.8 to require a mandatory voter-verified paper audit trail for ALL voters and voting systems.	Accepted	Carol Paquette	
1511	1.6.8			NULL	Subject: Section 6.8 Voluntary Voting System Guidelines I want Section 6.8 to require a voter-verified paper audit trail for ALL voters and voting systems. It should be mandatory.	Accepted	Merle King	
1541	1.6.8			NULL	Dear Sirs: I want Section 6.8 to require a voter-verified paper audit trail for ALL voters and voting systems. It should be mandatory.	Accepted	Merle King	
1552	1.6.8			NULL	Subject: get an audit trail! I want Section 6.8 to require a voter-verified paper audit trail for ALL voters and voting systems. It should be mandatory.	Accepted	Merle King	
1558	1.6.8			NULL	I want Section 6.8 to require a voter-verified paper audit trail for ALL voters and voting systems. It should be mandatory.	Accepted	Merle King	
2116	1.6.8			NULL	I want Section 6.8 to require a voter-verified paper audit trail for all voters and voting systems. It should be mandatory	Accepted	Merle King	
2114	1.6.8			NULL	I want Section 6.8 to require a voter-verified paper audit trail for ALL voters and voting systems. It should be mandatory. I am a registered voter	Accepted	Merle King	
2115	1.6.8			NULL	I want Section 6.8 to require a voter-verified paper audit trail for ALL voters and voting systems. It should be mandatory. The reasons why should be obvious.	Accepted	Merle King	
2128	1.6.8			NULL	I want Section 6.8 to require a voter-verified paper audit trail for ALL voters and voting systems. It should be mandatory. The reasons why should be obvious.	Accepted	Merle King	
2129	1.6.8			NULL	I want Section 6.8 to require a voter-verified paper audit trail for ALL voters and voting systems. It should be mandatory."	Accepted	Merle King	

Section Comments Sorted by Section Number

2103	1.6.8			NULL	I want Section 6.8 to require a voter-verified paper audit trail for ALL voters and voting systems. It should be mandatory. The current proposal does NOT require voter-verified paper audit trail.	Accepted	Merle King	
2118	1.6.8			NULL	I want Section 6.8 to require a voter-verified paper audit trail for ALL voters and voting systems. It should be mandatory. Anything less allows votes to be secretly dropped, which undermines the integrity of the US voting system, and can lead to the	Accepted	Merle King	
2134	1.6.8			NULL	I want Section 6.8 to require a voter-verified paper audit trail for ALL voters and voting systems. It should be mandatory. The reasons why should be obvious. The current proposal does NOT require voter-verified paper audit trail. (I also added the	Accepted	Merle King	
505	1.6.8.1			NULL	6.8.1.4 The paper record shall be used to conduct mandatory, random, manual, real-time, paper audits of the digital voting system. Voting System Vendor Pre-Voting Voting Post-Voting Discussion: The electronic record, digital vote pro Comments and Recommendations, Section 6.8 Public comment, see below. Deletions in Red, discussion and recommended changes in Blue: 6.8 Requirements for Voter Verified Paper Audit Trail <(Optional) This section contains requirements for Voter Verifie	Accepted	Merle King	
498	1.6.8.1		36	14 NULL		Accepted	Merle King	
502	1.6.8.1.1		36	16 NULL	6.8.1 Display and Print a Paper Record 6.8.1.1 The voting system shall print and display a paper record of the voter's ballot choices prior to the voter making the ballot choices final. V Voting System Vendor Pre-Voting Voting Post-Voting Voter Verified Paper Audit Trail (Optional) Conflicting Requirements 6.8.1.1: The voting system shall print and display a paper record of the voter's ballot choices prior to the voter making the ballot choices final. Does this conflict with section 1	Accepted	Merle King	
1457	1.6.8.1.1			NULL	Comment: "The paper record shall contain all information stored in the electronic record" Recommended change: "...shall contain all VOTER CHOICE information stored..." Rationale: should be modified to more accurately reflect the intent descri	Accepted	Merle King	
1685	1.6.8.1.2		36	NULL		NULL	NULL	

Section Comments Sorted by Section Number

1689	1.6.8.1.2	36	NULL	52 Comment: "The paper record shall contain all information stored in the electronic record" Recommend: "...shall contain all VOTER CHOICE information stored..." Rationale: should be modified to more accurately reflect the intent described i	NULL	NULL	
1934	1.6.8.1.2	36	NULL	52 6.8.1.2.36 "The paper record shall contain all information stored in the electronic record" "...shall contain all VOTER CHOICE information stored..." should be modified to more accurately reflect the intent described in the discussion sec	NULL	NULL	
503	1.6.8.1.2		NULL	6.8.1.2 The paper record shall constitute a complete record of ballot choices that <canis required to be used to assess the accuracy of the voting station's electronic record, to verify the election results by conducting mandatory real-time manual pa	Accepted	Merle King	
1942	1.6.8.1.2	36	NULL	52 6.8.1.2.36 "The paper record shall contain all information stored in the electronic record" "...shall contain all VOTER CHOICE information stored..." should be modified to more accurately reflect the intent described in the discussion sec	Accepted	Merle King	
504	1.6.8.1.3	37	8 NULL	6.8.1.3 The paper record shall contain all information stored in the electronic record. Voting System Vendor Pre-Voting Voting Post-Voting Discussion: The electronic record cannot hide any information related to ballot choices; all info	Accepted	Merle King	
1460	1.6.8.1.3		NULL	Voter Verified Paper Audit Trail (Optional) Imprecise • 6.8.1.3: The paper record shall contain all information stored in the electronic record. The discussion indicates some electronic content need not be printed. The requirement needs to identify w	Accepted	Merle King	
361	1.6.8.2.2	38	14 NULL	Discussion: Many users who are unfamiliar with electronics, touch screens and computers and the like may find it easier to use a hand-held magnifier. The guidelines should allow the low-tech magnifier to meet this requirement.	Accepted	Carol Paquette	
510	1.6.8.2.2	38	14 NULL	Current Standard 6.8.2.2 – The voting station shall be capable of showing the information on the paper in a font size of at least 3.0 mm, and should be capable of showing the information in at least two font ranges (a) 3-4 mm and (b) 6-3-9 mm, under cont	Accepted	Merle King	
515	1.6.8.2.2		NULL	Revise 6.8.2.2 to read: "The voting station shall be capable of showing the information on the paper in at least two font ranges (a) 3–4 mm and (b) 6-3-9 mm."	Accepted	Merle King	

Section Comments Sorted by Section Number

2151	1.6.8.2.2			NULL	6.8.2.2 Font size This is an issue of practicality. It is simply not realistic to require the printer to print in large font sizes. Larger font sizes use up more inches of paper for each ballot... thereby requiring larger printers and larger rolls of paper... Specific Recommendations: Revise 6.0.2.2.1. [6.8.2.2.1?] The voting station shall display all information in at least two font sizes, a) 3.0-4.0 mm and b) 6.3-9.0 mm, under control of the voter	Accepted	Merle King	
1005	1.6.8.2.2.1	38		NULL	Yet 6.0.2.2.2 [6.8.2.2.2] requires the VVPAT ballot and the electronic display to be presented simultaneously for easy comparison. If the voter can't see/read the VVPAT because the size of the print is too small they certainly cannot do a comparison. Th	Accepted	Merle King	
1004	1.6.8.2.2.2			NULL	Discussion It should be clear that this requirement only applies to those cases in which there is a record on a DRE and on a paper medium. It should be acceptable to mark a ballot and to verify it on a system that uses the same technology with which the	Accepted	Merle King	
362	1.6.8.2.3	38	27	NULL	Comments on Section 6.8.3 VVPAT Voting Station Accessibility 6.8.3.1 All accessibility requirements from Section 2.2.7 shall apply to voting stations with VVPAT, except as set forth in Section 6.0.2.3.3.1.2. This requirement has a broken reference to a	Accepted	Carol Paquette	
460	1.6.8.3	40	2	NULL	6.8.6.3.1 Throughout section, page numbers were not like other sections, doesn't have section-page, i.e. 6-3 Throughout section, page numbers were not like other sections, doesn't have section-page, i.e. 6-3	Accepted	Merle King	
671	1.6.8.3			NULL	53 Comment Requirements in this section are in addition to the accessibility and alternative languages requirements from Section 2.2.7..... an accessible voter verification procedure for voters be provided at voting sites, including... voters with Nati	Accepted	Merle King	
1690	1.6.8.3.1	40		NULL	53 1.6.8.3.1 40 Requirements in this section are in addition to the accessibility and alternative languages requirements from Section 2.2.7..... an accessible voter verification procedure for voters be provided at voting sites, including... voters with N	NULL	NULL	
1935	1.6.8.3.1	40		NULL	Unable to Locate Cross Reference • 6.8.3.1: All accessibility requirements from Section 2.2.7 shall apply to voting stations with VVPAT, except as set forth in Section 6.0.2.3.3.1.2. I can't locate Section 6.0.2.3.3.1.2. [Statements submitted at E	Accepted	Merle King	
1475	1.6.8.3.1			NULL		Accepted	Merle King	

Section Comments Sorted by Section Number

1943	1.6.8.3.1	40	NULL	53 I 6.8.3.1 40 Requirements in this section are in addition to the accessibility and alternative languages requirements from Section 2.2.7.....an accessible voter verification procedure for voters be provided at voting sites, including... voters with N	Accepted	Merle King	
727	1.6.8.3.2	46	15 NULL	6.8.3.2 The voting station shall display, print, and store a paper record in any of the alternative languages chosen for making ballot selections. The discussion note of this requirement has a broken reference to a section 6.0.2.5.1.3. (We believe that	Accepted	Merle King	
363	1.6.8.3.2	40	13 NULL	Discussion: It is not always clear what a "voting station" is. In systems that mark ballots, is the voting station the machine on which the ballot is marked or is it the imprecinct machine on which the ballot is tabulated? Consequently, we recommend th	Accepted	Carol Paquette	
1693	1.6.8.3.3	40	NULL	54 Comment :..the candidate names on the records shall be in English." Recommended change: candidate names shall be in whatever language the candidate name is on the DRE. Rationale: Some customers use transliteration	NULL	NULL	
1936	1.6.8.3.3	40	NULL	54 I 6.8.3.3 40 "...the candidate names on the records shall be in English." candidate names shall be in whatever language the candidate name is on the DRE. Some customers use transliteration	NULL	NULL	
1944	1.6.8.3.3	40	NULL	54 I 6.8.3.3 40 "...the candidate names on the records shall be in English." candidate names shall be in whatever language the candidate name is on the DRE. Some customers use transliteration	Accepted	Merle King	
1694	1.6.8.3.4	40	NULL	55 Comment: "Other marking not related to ballot selection on the paper record shall be in English." Recommended change: change the wording on the requirement to : "Other marking not related to ballot selection and verification status of the paper record shall b	NULL	NULL	
1937	1.6.8.3.4	40	NULL	55 I 6.8.3.4 40 "Other marking not related to ballot selection on the paper record shall be in English." change the wording on the requirement to : "Other marking not related to ballot selection and verification status of the paper record shall b	NULL	NULL	
1945	1.6.8.3.4	40	NULL	55 I 6.8.3.4 40 "Other marking not related to ballot selection on the paper record shall be in English." change the wording on the requirement to : "Other marking not related to ballot selection and verification status of the paper record shall b	Accepted	Merle King	

Section Comments Sorted by Section Number

512	1.6.8.3.5	41	4	NULL	Current Standard 6.8.3.5 -- If the normal procedure includes VVPAT, the Acc-VS should provide features that enable voters who are blind to perform this verification. (Page 41, line 4) The first two standards taken together deny equal access to systems	Accepted	Merle King	
513	1.6.8.3.5	41	4	NULL	IMPORTANT NOTE: Making "optical aids" available at a polling place is NOT an appropriate accessibility solution and it cannot be used in place of electronic output of large print, high contrast text. Non-electronic magnifiers must be matched to an indivi	Accepted	Merle King	
461	1.6.8.3.5	41	4	NULL	6.8.3.5 If the normal voting procedure includes VVPAT, the accessible voting station should provide features that enable voters who are blind to perform this verification. We suggest the inclusion of an additional requirement related to 6.8.3.5 (e.g., 6.	Accepted	Merle King	
2153	1.6.8.4			NULL	6.8.4 Approve or Spoil the Paper Record This is another issue of practicality. This section refers to spoiled electronic ballots. In reality, there are no spoiled electronic ballots. The voter may reject the paper record, but the electronic ballot is not r	Accepted	Merle King	
1699	1.6.8.4.1	41		NULL	56 Comment: "...if spoiled, the corresponding electronic record be marked as spoiled and preserved." Recommended change: recommend changing this requirement to "...create an audit trail for spoiled ballots." Rationale: This means that we would h	NULL	NULL	
1938	1.6.8.4.1	41		NULL	56 1.6.8.4.1 41 "...if spoiled, the corresponding electronic record be marked as spoiled and preserved." recommend changing this requirement to "...create an audit trail for spoiled ballots." This means that we would have to store the contents of	NULL	NULL	
1946	1.6.8.4.1	41		NULL	56 1.6.8.4.1 41 "...if spoiled, the corresponding electronic record be marked as spoiled and preserved." recommend changing this requirement to "...create an audit trail for spoiled ballots." This means that we would have to store the contents of	Accepted	Merle King	
364	1.6.8.4.2	41	24	NULL	Discussion: Here again, DRE machines are different from ballot marking systems. It is not always clear in ballot marking systems, what the "voting station" is. With clarification, this is a positive requirement that should be kept for all systems. We r	Accepted	Carol Paquette	

Section Comments Sorted by Section Number

1701	1.6.8.4.3	42		NULL	57 Comment: "The voting station should mark and preserve electronic and paper records that have been spoiled." Recommended change: recommend changing this to "... mark and preserve paper records, and create an audit trail for spoiled ballots."	NULL	NULL	
1939	1.6.8.4.3	42		NULL	57 I 6.8.4.3 42 "The voting station should mark and preserve electronic and paper records that have been spoiled." recommend changing this to "... mark and preserve paper records, and create an audit trail for spoiled ballots." See rationale for	NULL	NULL	
668	1.6.8.4.3	42, 43	1, 1	NULL	6.8.4.3 & 6.8.4.7 (where, how is paper record stored? Something must be directed here so that the voter does NOT take the paper ballot with him. It would lead to vote buying 57 I 6.8.4.3 42 "The voting station should mark and preserve electronic and paper records that have been spoiled." recommend changing this to "... mark and preserve paper records, and create an audit trail for spoiled ballots." See rationale for	Accepted	Merle King	
1947	1.6.8.4.3	42		NULL	58 Comment: "Vendor documentation shall include procedures for returning a voting station to correct operation after a voter has used it incompletely or incorrectly." Recommended change: request that this be removed from the standard. Ratio	Accepted	Merle King	
1703	1.6.8.4.7	43		NULL	58 I 6.8.4.7 43 "Vendor documentation shall include procedures for returning a voting station to correct operation after a voter has used it incompletely or incorrectly." request that this be removed from the standard. This should be document	NULL	NULL	
1940	1.6.8.4.7	43		NULL		NULL	NULL	
367	1.6.8.4.7	43	1	NULL	Discussion: It seems that this requirement is DRE specific. We recommend the following clarification: "On systems on which an electronic record is created by the voter, the voting system shall not record the electronic record as being approved by the Voter Verified Paper Audit Trail (Optional) Imprecise • 6.8.4.7: The voting system should not record the electronic record as being approved by the voter until the paper record has been stored. What should happen to the record if it is not approved?	Accepted	Carol Paquette	
1462	1.6.8.4.7			NULL		Accepted	Merle King	

Section Comments Sorted by Section Number

1948	1.6.8.4.7	43	NULL	58 6.8.4.7 43 "Vendor documentation shall include procedures for returning a voting station to correct operation after a voter has used it incompletely or incorrectly..." request that this be removed from the standard. This should be document	Accepted	Merle King	
2154	1.6.8.5		NULL	6.8.5 Preserve Voter Privacy and Anonymity One of the problems with HAVA is that people are still trying to determine what the law requires. We don't want that to occur with this document. I had my staff review this draft guidance and based upon requirements	Accepted	Merle King	
1705	1.6.8.5.3	44	NULL	59 Comment: Refers to maintaining the privacy and anonymity of non- English voters. The discussion section states: "One method for achieving this is to ensure that no less than, e.g., five voter use any of the alternative languages for their ballot"	NULL	NULL	
519	1.6.8.5.3	44	15 NULL	Current Standard 6.8.5.3 -- The privacy and anonymity of voters whose paper records contain any of the alternative languages chosen for making ballot sections shall be maintained. (Page 44, line 15) These requirements together seem to require that elec	Accepted	Merle King	
1458	1.6.8.5.3		NULL	Voter Verified Paper Audit Trail (Optional) Conflicting Requirements 6.8.5.3 The privacy and anonymity of voters whose paper records contain any of the alternative languages chosen for making ballot selections shall be maintained. As the number of	Accepted	Merle King	
1949	1.6.8.5.3	44	NULL	59 6.8.5.3 44 Refers to maintaining the privacy and anonymity of non- English voters. The discussion section states: "One method for achieving this is to ensure that no less than, e.g., five voter use any of the alternative languages for their ba	Accepted	Merle King	
669	1.6.8.5.4	44	23 NULL	6.8.5.4 Where's the teeth in this section How are you going to prevent this, who's going to? You better put in penalties or suggestions of penalties This is really opening up the door	Accepted	Merle King	
368	1.6.8.5.4	44	23 NULL	Discussion: As drafted, this requirement places a constraint on voter behavior not on the voting system. We recommend the following that may solve that problem and resolve an ambiguity ("voting area" - which does not appear in the Glossary) as well:	Accepted	Carol Paquette	

Section Comments Sorted by Section Number

1464	1.6.8.5.4			NULL	Voter Verified Paper Audit Trail (Optional) Imprecise • 6.8.5.4: The voter shall not be able to leave the voting area with the paper record if the information on the paper record can directly reveal the voter's choices. There is no definition of a voter record that is easily memorable by the voter." The discussion takes it one step further "Unique identifiers on the paper record are displayed or formatted in such a way that they are not memorized"	Accepted	Merle King	
1708	1.6.8.5.5	44		NULL	60 1.6.8.5.5 44 "Unique identifiers shall not be displayed in a way that is easily memorable by the voter." The discussion takes it one step further "Unique identifiers on the paper record are displayed or formatted in such a way that they are not memorized"	NULL	NULL	
1950	1.6.8.5.5	44		NULL	66 Comment: The barcode shall not contain any information other than the paper record's human readable content and digital signature information. Recommended change: Modify to allow additional election information or removed. Rationale: One	Accepted	Merle King	
1715	1.6.8.6.10.2	50		NULL	66 1.6.8.6.10.2 50 The barcode shall not contain any information other than the paper record's human readable content and digital signature information. Modify to allow additional election information or removed. One example is "global" info	NULL	NULL	
1956	1.6.8.6.10.2	50		NULL	Discussion: We believe we understand the intent of this requirement, but as drafted, this requirement places undesirable constraints on a paper trail. For example, if the paper trail bar code contains an Error Correcting Code (ECC) desirable to ensure	Accepted	Merle King	
370	1.6.8.6.10.3	50	10	NULL	67 1.6.8.6.11 50 "The voting system vendor shall provide full documentation for procedures for exporting its electronic records and reconciling its electronic records with its paper records." Recommend eliminating this requirement. How can the	Accepted	Carol Paquette	
1957	1.6.8.6.11	50		NULL	61 Comment: "All cryptographic software in the voting system should be approved by the U.S. Government's Cryptographic Module Validation program." Recommended change: strike this requirement from the standard Rationale: Vendors are capable of	Accepted	Merle King	
1710	1.6.8.6.2	45		NULL		NULL	NULL	

Section Comments Sorted by Section Number

462	1.6.8.6.2	45	18	NULL	Comments on Section 6.8.6 Electronic and Paper Record Structure 6.8.6.2 All cryptographic software in the voting system should be approved by the U.S. Government's Cryptographic Module Validation Program (CMVP) as applicable. Since this requirement is n	Accepted	Merle King	
1466	1.6.8.6.2			NULL	Voter Verified Paper Audit Trail (Optional) Imprecise • 6.8.6.2: All cryptographic software in the voting system should be approved by the U.S. Government's Cryptographic Module Validation Program (CMVP), as applicable. This requirement is too broad.	Accepted	Merle King	
1951	1.6.8.6.2	45		NULL	611 6.8.6.2 45 "All cryptographic software in the voting system should be approved by the U.S. Government's Cryptographic Module Validation program." strike this requirement from the standard Vendors are capable of validating the proper impl	Accepted	Merle King	
1952	1.6.8.6.3	46		NULL	621 6.8.6.3 46 "The records shall include a voting session identifier that is generated when the voting system is placed in voting mode and that can be used to identify the records as being created during that voting session." The discussion goes	Accepted	Merle King	
670	1.6.8.6.3.1	46	6	NULL	6.8.6.3.1 This is not taking into account split ballot combinations/faces	Accepted	Merle King	
1712	1.6.8.6.5	47		NULL	63 Comment: "Should generate and store a digital signature for each electronic record." See 6.8.6.2 as well, which propagates this requirement. Recommended change: recommend that this be reworded "...should generate and store a digital signatu	NULL	NULL	
463	1.6.8.6.5	47	10	NULL	6.8.6.5 The voting system should generate and store a digital signature for each electronic record. We suggest to expand this requirement to ensure that this digital signature also validates the contents of the paper record. The requirement could be modi	Accepted	Merle King	
1953	1.6.8.6.5	47		NULL	631 6.8.6.5 47 "Should generate and store a digital signature for each electronic record." See 6.8.6.2 as well, which propagates this requirement. recommend that this be reworded "...should generate and store a digital signature that is derived f	Accepted	Merle King	
1467	1.6.8.6.6.1			NULL	Voter Verified Paper Audit Trail (Optional) Imprecise • 6.8.6.6.1: The exported electronic records shall be in a publicly available, non-proprietary format. It would be helpful to specify a "preferred" group of formats and permit the use of other pub	Accepted	Merle King	

Section Comments Sorted by Section Number

1711	1.6.8.6.7	48	NULL	62 Comment: "The records shall include a voting session identifier that is generated when the voting system is placed in voting mode and that can be used to identify the records as being created during that voting session." The discussion goes fu	NULL	NULL	
1713	1.6.8.6.7	48	NULL	64 Comment: "The paper record should be created in a format that may be made available across different manufacturers of electronic voting systems." The discussion continues "There may be a future requirement for some commonality in the format of	NULL	NULL	
1470	1.6.8.6.7		NULL	Voter Verified Paper Audit Trail (Optional) Imprecise • 6.8.6.7: The paper record should be created in a format that may be made available across different manufacturers of electronic voting systems. The requirement needs to specify standard format(s)	Accepted	Merle King	
1954	1.6.8.6.7	48	NULL	64 1.6.8.6.7 48 "The paper record should be created in a format that may be made available across different manufacturers of electronic voting systems." The discussion continues "There may be a future requirement for some commonality in the format	Accepted	Merle King	
1714	1.6.8.6.8		NULL	65 Comment: "Paper record shall be created such that its contents are machine-readable." The discussion continues "this can be done by using specific OCR fonts." Recommended change: Recommend rewording this requirement to "the paper record shall	NULL	NULL	
1472	1.6.8.6.8		NULL	Voter Verified Paper Audit Trail (Optional) Imprecise • 6.8.6.8: The paper record shall be created such that its contents are machine-readable. The requirement should specify what minimum part of the record is machine-readable. Does 6.8.6.10 regardin	Accepted	Merle King	
1955	1.6.8.6.8	48	NULL	65 1.6.8.6.8 48 "Paper record shall be created such that its contents are machine-readable." The discussion continues "this can be done by using specific OCR fonts." Recommend rewording this requirement to "the paper record shall be created such	Accepted	Merle King	
2156	1.6.8.7		NULL	In Section 6.8.7, the requirement that the voting station be physically secure from intentional damage cannot be met by either the vendor or the election administrator. If someone wants to intentionally damage a voting machine, they are going to be able to	Accepted	Merle King	

Section Comments Sorted by Section Number

2157	1.6.8.7		NULL	In Section 6.8.7, the requirement to seal the connection between the printer and the voting system seems unnecessary. If the power connection is broken, the voting machine locks up. It not only would be very difficult to create a seal that would work in th	Accepted	Merle King	
1717	1.6.8.7.2.1	51	NULL	67 Comment: "The voting station shall provide a standard, publicly documented printer port using a standard communication protocol." Recommended change: Recommend eliminating this requirement. Rationale: 68 6.8.7.2.1 51 "The voting station shall provide a standard, publicly documented printer port using a standard communication protocol." Recommend eliminating this requirement. This dictates a single solution (off the shelf, dumb printer) to	NULL	NULL	
1958	1.6.8.7.2.1	51	NULL	Discussion: This requirement produces no security and is in fact probably impossible for systems that are ballot marking systems and not DRE systems. In addition to the practical difficulties, many feel that a voter's confidence is enhanced when the vo	Accepted	Merle King	
371	1.6.8.7.2.2	51	14 NULL	Comments on Section 6.8.7 Equipment Security and Reliability 6.8.7.2.2 The paper path between the printing, viewing and storage of the paper record shall be protected and sealed from access except by authorized election officials. This requirement conff	Accepted	Carol Paquette	
464	1.6.8.7.2.2		NULL	69 Comment: The printer shall not be permitted to communicate with any other system or machine other than the single voting machine to which it is connected. Recommended change: Should be removed because it precludes useful applications. Rat	Accepted	Merle King	
1719	1.6.8.7.2.3	51	NULL	General Considerations Section 6.8 details the security requirements for VVPAT systems. The requirements consider only one of the potential implementations of VVPAT systems. This implementation is based on a voting system composed of a voting terminal c	NULL	NULL	
459	1.6.8.7.2.3	51	20,26 NULL	6.8.7.2.3 The printer shall not be permitted to communicate with any other system or machine other than the single voting machine to which it is connected. This requirement limits the use of VVPAT systems to those based only on a voting terminal and a p	Accepted	Merle King	
465	1.6.8.7.2.3	51	20 NULL		Accepted	Merle King	

Section Comments Sorted by Section Number

1959	1.6.8.7.2.3	51	NULL	69 6.8.7.2.3.51 The printer shall not be permitted to communicate with any other system or machine other than the single voting machine to which it is connected. Should be removed because it precludes useful applications. One example would be	Accepted	Merle King	
1720	1.6.8.7.2.4	51	NULL	70 Comment: "The printer shall only be able to function as a printer; it shall not contain any other services (e.g., provide copier or fax functions) or network capability." Recommended change: Should be removed because it dictates implementation	NULL	NULL	
1960	1.6.8.7.2.4	51	NULL	70 6.8.7.2.4.51 "The printer shall only be able to function as a printer; it shall not contain any other services (e.g., provide copier or fax functions) or network capability." Should be removed because it dictates implementation. Who's to Discussion: For reasons cited above, this requirement produces no security and is in fact probably impossible for systems that are ballot marking systems and not DRE systems. Many feel that a voter's confidence is enhanced when the voter can handle a b	Accepted	Merle King	
372	1.6.8.7.2.7	52	15 NULL	Voter Verified Paper Audit Trail (Optional) Imprecise • 6.8.7.2.7 Tamper-evident seals or physical security measures shall protect the connection between the printer and the voting system, so that the connection cannot be broken or interfered with wi	Accepted	Carol Paquette	
1474	1.6.8.7.2.7		NULL		Accepted	Merle King	
1498	1.6.8.7.5		NULL	However, fortunately, there are numerous guidelines in sec 6.8 concerning what voting machines that miraculously DO happen to go beyond guideline requirements by providing paper trails, should be like, and I largely agree with them. But 6.8.7.5 is	Accepted	Merle King	
1721	1.7		NULL	71 No comments	NULL	NULL	
672	1.7		NULL	Vol. 1, Sect 7 Punctuation, numbering, spacing appears to be more consistent with other sections (but vol 1, sect 6 is NOT)	Accepted	Merle King	
1962	1.7		NULL	71 7 All All No comments.	Accepted	Merle King	
1596	1.7.1	11-Jan 18-21	NULL	Comment: NSRL software repository if now a requirement. Recommended change: None Rationale: N/A	Accepted	Merle King	
2160	1.7.1		NULL	Below is a table with reference to where some of the points we have raised should be addressed in The Guidelines. It also raises additional questions and points. Because we've called on the EAC to broaden its scope, this table cannot be complete as numerou	Accepted	Merle King	

Section Comments Sorted by Section Number

				Reword last sentence, paragraph 1 Section 1.7.2.2 to read: "To claim that a voting system is certified, the voting system vendor shall satisfy the requirements for certification testing, successfully complete the test campaign with an accredited voting	Accepted	Merle King	
1039	1.7.2.2	13-Jan		7.4 Shouldn't test results be supplied as a given rather than upon request	Accepted	Merle King	
673	1.7.4	2		72 No comments.	Accepted	Merle King	
1722	1.8			Vol 1, Sect 8 Okay!	Accepted	Merle King	
674	1.8				Accepted	Merle King	
967	1.8	11		Vol II Current: Whether one or more test labs are used, the testing generally consists of three phases: • Pre-test Activities; • Qualification Testing; and • Qualification Report Issuance and Post-test Activities. Change: Whether one or more	Accepted	Merle King	
				The Commission should consider whether the WSG effective date leaves adequate time for all 55 Federal jurisdictions to conform to the guidelines. A Presidential election may have numerous complications and the introduction of "higher" standards within a fe	Accepted	Merle King	
1726	1.8			We reiterate our suggestion that this section and other language regarding the full system testing be modified to permit components of various systems to be tested against different versions of standards. Under our recommended approach, a system would onl	Accepted	Merle King	
1755	1.8	15-Jan		72 1 8 All All No comments.	Accepted	Merle King	
1964	1.8			Current: a. Request the performance of qualification testing from among the accredited test labs. Change: a. Request the performance of certification testing from among the accredited test labs. Nature of Change: Deprecated term	Accepted	Merle King	
968	1.8.1.1	11		Vol II Current: Certification testing encompasses the preparation of a test plan, the establishment of the appropriate test conditions, the use of appropriate test fixtures, the witness of the system build and installation, the maintenance of qualifi	Accepted	Merle King	
969	1.8.2			In this test requirement in item (a), there is mention of "at least one independent, qualified observer, who shall witness that the test and data acquisition requirements have been satisfied.", yet there is no mention of how this qualified person is select	Accepted	Merle King	
1149	1.8.2.2	(Vol 2)			Accepted	Merle King	

Section Comments Sorted by Section Number

1141	1.8.2.4	(Vol 2)		NULL	In this test requirement in Vol.2, Section 1.8.2.4, "Witness of System Build and Installation ", it is required to perform the witness build at the vendor site, but it would also be practical to allow the witness build to be performed at the test lab's site	Accepted	Merle King	
970	1.8.2.4			NULL	Vol II Current: The system elements witnessed, including their specific versions, shall become the specific system version that is recommended for qualification. Change: The system elements witnessed, including their specific versions, shall be Current: The ITA shall evaluate data resulting from examinations and tests, employing the following practices: Change: The Voting System Testing Laboratory shall evaluate data resulting from examinations and tests, employing the following practice	Accepted	Merle King	
973	1.8.2.6		Vol II	NULL	Vol. II Current: e. Upon review and acceptance of the test report, EAC shall issue a Certification Number for the system to the vendor and to the test lab. The issuance of a Qualification Number indicates that the system has been tested by certified Attached is a proposed new section (Vol. 2, Section 1.9: Transparency and Freedom of Information) that would attempt to bring transparency to the independent test labs and certification processes by mandating that certain documents relating to certification	Accepted	Merle King	
966	1.8.3		e	NULL	Vol. II Current: e. Upon review and acceptance of the test report, EAC shall issue a Certification Number for the system to the vendor and to the test lab. The issuance of a Qualification Number indicates that the system has been tested by certified Attached is a proposed new section (Vol. 2, Section 1.9: Transparency and Freedom of Information) that would attempt to bring transparency to the independent test labs and certification processes by mandating that certain documents relating to certification	Accepted	Merle King	
1317	1.9			EAC_Vol2_1	Vol. II App. A First sentence Comment: "be" missing from sentence Recommended change: Add "be" between "must" and "presented" Rationale: typo	Accepted	Merle King	
331	11	1	1	NULL	Vol. II App. A First sentence Comment: "be" missing from sentence Recommended change: Add "be" between "must" and "presented" Rationale: typo	1 NULL	NULL	
1918	2	A-2		NULL	137 Vol. II Appendix B No comments.	NULL	NULL	
1919	2			NULL	138 Vol. II App. C No comments.	NULL	NULL	
1920	2			NULL	140-2 Vol II, App C, section C1, page C-1 Comment: "...the need to achieve a meaningful test at a reasonable cost, and cost varies with the difficulty of simulating expected real-world operating conditions and with test duration."	NULL	NULL	
1924	2			NULL	Recommend	NULL	NULL	
297	2	2	2	NULL	test 2	Accepted	Juliet Thompson	
1227	2			NULL	There are several areas in section two when the conformance language is inconsistent. Below are two examples: 1. The voting process shall preclude anyone else from determining the content of a voter's ballot, without the voter's cooperation. Discu	Accepted	Merle King	

Section Comments Sorted by Section Number

1228 2			NULL	Question: Why does this section use a statement then discussion format?	Accepted	Merle King	
2038 2	A-3-2		NULL	136 II App A.3 A-2 First sentence "be" missing from sentence Add "be" between "must" and "presented" typo	Accepted	Merle King	
2039 2	B		NULL	137 II App B All All No comments.	Accepted	Merle King	
2040 2	C		NULL	138 II App C All All No comments.	Accepted	Merle King	
2044 2	C-1		NULL	140b G All All All Cost: Vol II, App C, section C1, page C-1 "... the need to achieve a meaningful test at a reasonable cost, and cost varies with the difficulty of simulating expected real-world operating conditions and with test duration." These [Note* Actually Volume II, Section 1] Vol 25, sec 1 (nat'l test guidelines) No page numbers for this section [Note* Actually Volume II, Section 1] Vol 25, sec 1 (nat'l test guidelines) ToC, page numbers aren't consistent with other sections	Accepted	Merle King	
684 2.1			NULL		Accepted	Merle King	
685 2.1			NULL	1.1 - Election Officials: Election officials will use Volume II to guide their State certification, procurement, and acceptance processes and requirements. Certification at the State level may entail system conformance with additional requirements beyond	Accepted	Merle King	
686 2.1.1		1	NULL	109 first bullet,second line Comment: The word "ate" should be "rate" Recommended change: change to "rate"	Accepted	Merle King	
1856 2.1.3		3	NULL	Rationale: Spelling	NULL	NULL	
1862 2.1.3		3	NULL	110 second bullet,third line Comment: "suing" should be "using" Recommended change: change to "using"	NULL	NULL	
1867 2.1.3		3	NULL	111 second bullet, third line Comment: Define "actual time-based period of processing test ballots" Recommended change: Need a definition Rationale: What does "time-based period" mean in this context? Needs to be clarified.	NULL	NULL	
688 2.1.3		3	NULL	- Operational failures or the number of unrecoverable failures under conditions simulating the intended storage, operation, transportation, and maintenance environments for voting systems, ** using ** an actual time-based period of processing test ballots	Accepted	Merle King	
687 2.1.3		2	NULL	1.3 - Operational accuracy in the recording and processing of voting data, as measured by target error rate, for which the maximum acceptable error rate is no more than one in ten million ballot positions, with a maximum acceptable ** error rate ** in t	Accepted	Merle King	

Section Comments Sorted by Section Number

1142	2.1.3	(Vol 2) 2-3	NULL	In the requirements for "Protection of Proprietary Information", the language used is inadequate. There should be a written agreement between the vendor and the reviewer (test lab, State or jurisdiction, not person), whereby the reviewer shall agree to	Accepted	Merle King	
2011	2.1.3	3	NULL	109 II 1.3.3 None provided -first bullet;second line The word "ate" should be "rate" change to "rate" Spelling	Accepted	Merle King	
2012	2.1.3	3	NULL	110 II 1.3.3 None provided -second bullet, third line "suing" should be "using" change to "using" Spelling	Accepted	Merle King	
2013	2.1.3	3	NULL	111 II 1.3.3 None provided -second bullet, third line Define "actual time-based period of processing test ballots" Need a definition What does "time-based period" mean in this context? Needs to be clarified.	Accepted	Merle King	
689	2.1.3.1	3	NULL	1.3.1 Spacing between intro info and bullets Not all systems being tested are required to complete all categories of testing. For example, if a previously certified system has had hardware modifications, the system may be subject only to non-operating	Accepted	Merle King	
690	2.1.3.1.1	4	NULL	1.1.1.1 Focus of Functionality Tests Functionality testing is performed to confirm the functional capabilities of a voting system. The test lab designs and performs procedures to test a voting system against the requirements outlined in Volume I, Section	Accepted	Merle King	
1872	2.1.3.1.2	4	NULL	112 second line Comment: Moreover, the severity of the test conditions, in most cases, has been reduced from that specified in the Military Standards to reflect commercial and industrial practice. Recommended change: make changes to 3.2.2.x	NULL	NULL	
691	2.1.3.1.2	4	NULL	1.3.1.2 No spacing between paragraphs as in other sections 112 II 1.3.1.2.4 Noneprovided - second line Moreover, the severity of the test conditions, in most cases, has been reduced from that specified in the Military Standards to reflect commercial and industrial practice. make changes to 3.2.2.x	Accepted	Merle King	
2014	2.1.3.1.2	4	NULL	second paragraph first line 113 Vol. I App. D Comment: Using language like "The test lab may inspect..." leaves no boundary for test practice. Recommended change: Remove such language entirely. Insure that language that allows for options is i	Accepted	Merle King	
1878	2.1.3.1.3	5	NULL	1.3.1.3 No spacing between title and body of information	NULL	NULL	
692	2.1.3.1.3	5	NULL		Accepted	Merle King	

Section Comments Sorted by Section Number

2015 2.1.3.1.3	5	NULL	113 II 1.3.1.3.5 None provided - second para. first line Using language like "The test lab may inspect..." leaves no boundary for test practice. Remove such language entirely. Insure that language that allows for options is intended. Lack of	Accepted	Merle King	
1885 2.1.3.1.4	5	NULL	114 first paragraph, last sentence Comment: Clarify and/or reference PCA and FCA. Recommended change: Reference where these terms are described in the guidelines. Rationale: It is unclear what these terms mean.	NULL	NULL	
1888 2.1.3.1.4 693 2.1.3.1.4	6-May 5	NULL NULL	115 Comment: Clarification should be made that existing, qualified systems will not have to undergo PCA and FCA audits. Only new functionality and changes require such audits. Recommended change: Add a paragraph that explains the guidelines for 1.3.1.4 Spacing problems between paragraphs The Functional Configuration Audit (FCA) is an exhaustive verification of every system function and combination of functions cited in the vendor's documentation. Through use, the FCA verifies the accuracy and completeness of the system TDP. The various opt	NULL Accepted	NULL Merle King	
694 2.1.3.1.4	6	NULL	114 II 1.3.1.4.5 None provided - first para, last sentence Clarify and/or reference PCA and FCA. Reference where these terms are described in the guidelines It is unclear what these terms mean.	Accepted	Merle King	
2016 2.1.3.1.4	5	NULL	115 II 1.3.1.4.5-6 All Clarification should be made that existing, qualified systems will not have to undergo PCA and FCA audits. Only new functionality and changes require such audits. Add a paragraph that explains the guidelines for existing.	Accepted	Merle King	
2017 2.1.3.1.4	6-May	NULL	116 Comment: Item K, witnessing of a system build, should be moved up in the sequence to reflect the fact that the build must be witnessed prior to functional and system testing. Recommended change: Move "k" ahead of "g". Rationale: This is	Accepted	Merle King	
1893 2.1.4	7	NULL		NULL	NULL	
1173 2.1.4	15-Feb	8 NULL	Substitute the word "monochromatic" for "black-and-white-only". Discussion: technically, a black-and-white-only display would not be able to use gray shades to improve readability of text by anti-aliasing; further, most monochromatic display technologies	Accepted	Merle King	

Section Comments Sorted by Section Number

2018 2.1.4	7	NULL	116 II 1.4.7 Item k Item K, witnessing of a system build, should be moved up in the sequence to reflect the fact that the build must be witnessed prior to functional and system testing. Move "k" ahead of "g". This is the proper sequence of t	Accepted	Merle King	
474 2.1.6		NULL	Section 1 National Certification Testing Guidelines 4.1.1. General Considerations The testing process described in Section 1.6 (Voting Equipment Submitted by Vendor) states that 0 "... vendors shall submit for testing the specific system configuration the	Accepted	Merle King	
695 2.1.6		NULL	1.6 b The b is listed twice D is bold type, in error	Accepted	Merle King	
697 2.1.7.1.1	8	NULL	ANSI or IEEE standard Do you want to define these here?	Accepted	Merle King	
696 2.1.7.1.1	8	NULL	1.7.1.1 Spacing between letter paragraphs is not like others—there's a space here where previous subsections don't have the space	Accepted	Merle King	
698 2.1.7.1.2	9	NULL	1.7.1.2 Again spacing between subsections Actually it's easier to read, but this whole section, vol 25, sect 2, needs to be consistent within itself and with other sections [Note* Volume II, not 25]	Accepted	Merle King	
699 2.1.7.2.1	9	NULL	1.7.2.1. Use of comma rather than semicolon between sect b & c, also use of word "or" when and has been used almost always throughout materials	Accepted	Merle King	
1898 2.1.8	10	NULL	117 Comment: Testing with multiple labs requires hardware testing to be completed prior to software testing can start. It should be stated that hardware and software functional testing can be done in parallel, but both must be completed prior to	NULL	NULL	
700 2.1.8	10	NULL	1.8 coordinated by a lead test lab. The lead lab is responsible for ensuring that all testing has a lead test lab..... the lead lab should it be the in both cases? Spacing before bullet points	Accepted	Merle King	
702 2.1.8		NULL	1.8.1.2 & 1.8.2.2 & 1.8.3, etc Spacing between subsections Spacing needs to be consistent throughout	Accepted	Merle King	
2019 2.1.8	10	NULL	117 II 1.8 10 First para Testing with multiple labs requires hardware testing to be completed prior to software testing can start. It should be stated that hardware and software functional testing can be done in parallel, but both must be comp	Accepted	Merle King	
1904 2.1.8.1	15	NULL	122 Comment: Referenced "Interpretation of guidelines" process should be documented and included in the released version. Recommended change: Replace this section with either the actual process referenced or a direct reference to an appendix co	NULL	NULL	

Section Comments Sorted by Section Number

1900	2.1.8.1.1	11		118 item a Comment: item a mentions accredited test labs Recommended change: clarify Rationale: EAC? NASED? AALA? etc.	NULL	NULL	
701	2.1.8.1.1	11		1.8.1.1. Use of commas rather than semicolons on subsections	Accepted	Merle King	
2020	2.1.8.1.1	11		118 II 1.8.1.1 11 item a mentions accredited test labs clarify EAC? NASED? AALA? etc.	Accepted	Merle King	
1901	2.1.8.1.2	12		119 part a Comment: Statement calls for a "complete TDP". This should be qualified for circumstances where a "complete TDP" are not required. Recommended change: Change to read "Vendor shall prepare and submit a TDP to the test lab. TDP must	NULL	NULL	
2021	2.1.8.1.2	12		119 II 1.8.1.2 12 part a Statement calls for a "complete TDP". This should be qualified for circumstances where a "complete TDP" are not required. Change to read "Vendor shall prepare and submit a TDP to the test lab. TDP must include all	Accepted	Merle King	
1902	2.1.8.2.2	12		120 Comment: Test process requires an "independent observer". Recommended change: Remove requirement to have an independent observer. Rationale: This requirement adds an undue burden on the test lab - and a significant extra cost to	NULL	NULL	
2022	2.1.8.2.2	12		120 II 1.8.2.2 12 part a Test process requires an "independent observer". Remove requirement to have an independent observer. This requirement adds an undue burden on the test lab - and a significant extra cost to the vendor.	Accepted	Merle King	
1903	2.1.8.2.6	13		121 first paragraph Comment: ITA term is used. Recommended change: Change to VSTL Rationale: Correct term	NULL	NULL	
2023	2.1.8.2.6	13		121 II 1.8.2.6 13 first para ITA term is used. Change to VSTL Correct term	Accepted	Merle King	
703	2.1.8.4	15		1.8.4. Prior to the transition of this function to the EAC ** in 2005, the NASED ** Voting Systems Spacing [Correction area marked in ** **]	Accepted	Merle King	
2024	2.1.8.4	15		122 II 1.8.4 15 All Referenced "interpretation of guidelines" process should be documented and included in the released version. Replace this section with either the actual process referenced or a direct reference to an appendix containing the	Accepted	Merle King	

Section Comments Sorted by Section Number

974 2.11.5	Feb-29	Vol II	NULL	Current: The vendor shall provide a description of the contents of a system release, and the procedures and related conventions by which the vendor installs, transfers, or migrates the system to ITAs and customers to address the specific requirements of	Accepted	Merle King	
1905 2.2			NULL	123 No comments.	NULL	Merle King	
				Section 2.2 states "All voting systems shall provide the following functional capabilities: Security, Accuracy, Error recovery, Integrity, System Auditability, Election Management System; accessibility; Vote tabulating; Ballot counters; and Data retention.	Accepted	Merle King	
1324 2.2	25	2	NULL	123 II 2 All All No comments.	Accepted	Merle King	
2025 2.2			NULL	These comments address the objectives, and scope of the VVSG as set forth in Sections 1.1 and 2.2. In light of these comments, we also call upon EAC to reexamine the definitions in 1.5, 1.5.1, 1.5.3 and the glossary definition of voting system in Appendix	Accepted	Merle King	
2145 2.2			NULL	A second section of the VVSG needs to be broadened. Section 2.2 on Overall System Capabilities is too narrowly drawn. It does not include two key system functionalities that should be made expressly mandatory for DRES. First it does not specify that a	Accepted	Merle King	
2147 2.2			NULL	2.10 Personnel The vendor shall describe the personnel resources and training required for a jurisdiction to operate and maintain the system. Line spacing error, line was broken too soon (but corrected above)	Accepted	Merle King	
707 2.2.10	26		NULL	This section includes a variety of functions that relate to voter registration, voter lists, etc, which are outside the scope of the VVSG.	Accepted	Merle King	
1805 2.2.10	Feb-48		NULL	2.2.2. a. The performance characteristics of each operating mode and function in terms of expected and maximum speed, ** throughput ** capacity, maximum volume (maximum number of voting positions and maximum number of ballot styles supported), and proce	Accepted	Merle King	
704 2.2.2			NULL	While noble objectives: this paragraph uses untestable terms such as "highest possible levels of protection".	Accepted	Merle King	
1757 2.2.2	3-Feb		NULL	Page 2-4 Section 2.2.2 and Volume 1, Appendix A This section could use additional clarity. It defines a ballot image as an electronic record of all votes cast by the voter, including undervotes. Volume 1, Appendix A Glossary defines both "ballot i	Accepted	Merle King	
1760 2.2.2.2	4-Feb		NULL	2.3 a indicated in Volume I, Section 2. The contents of Volume I Section 2 may be not same punctuation	Accepted	Merle King	
705 2.2.3	5		NULL		Accepted	Merle King	

Section Comments Sorted by Section Number

1070	2.2.4.1	5-Feb	NULL	The requirement in item (h) to "Maintain a permanent record of all original audit data that cannot be modified or overridden but may be augmented by designated authorized officials in order to adjust for errors or omissions (e.g., during the canvassing process)"	Accepted	Merle King	
1761	2.2.4.1	4-Feb	NULL	2.2.4.1(a) The language in 2.2.4.1(a) appears to have the superfluous language of "by a means compatible with these Guidelines" which should be either included in Sections 2.2.4.1(b-j) or deleted.	Accepted	Merle King	
988	2.2.4.2		NULL	Make this section and any other reference to "record of each ballot" clearly require a PAPER copy that is verified by the voter! I am a computer programmer and I know the importance of this requirement for all forms of electronic voting.	Accepted	Merle King	
1762	2.2.5.1	6-Feb	NULL	The last line in this section references a document, which is listed as appearing on the EAC web page, but it looks like it was formerly on the web site of the FEC, but is no longer posted on that site.	Accepted	Merle King	
1071	2.2.5.2.1	7-Feb	NULL	The requirement in item (d) that "The audit record shall be active whenever the system is in an operating mode. This record shall be available at all times, though it need not be continually visible." seems to imply that the audit log should also be 'avail	Accepted	Merle King	
1167	2.2.5.2.1	6-Feb	NULL	The accuracy of time/date tracking and "time-and-date stamp" is never specified. Three such requirements seem appropriate: 1. Timekeeping mechanisms shall generate monotonically increasing time-and-date values. Discussion: some clock correction methods	Accepted	Merle King	
1072	2.2.5.2.3	8-Feb	NULL	For the requirement "The system shall provide a capability for a jurisdiction to designate critical status messages", allowing jurisdictions to designate, in the system, the criticality of the status messages is not a good idea. Interpretation of a status	Accepted	Merle King	
1763	2.2.5.2.3	8-Feb	NULL	The last paragraph appears to indicate that jurisdictions should be charged with designating which status messages are deemed critical. This is probably an issue that should be resolved at the ITA level rather than at the local level where technical expert	Accepted	Merle King	
1027	2.2.7	Feb-30	NULL	On Human Factors, line 16 reads "Voting Rights Act of 1975." The language should be changed to "Voting Rights Act of 1965. Here is only referred to an overvote. Should this not be valid for an undervote when the ballot is casted?"	Accepted	Merle King	
1166	2.2.7	Feb-43	1 NULL		Accepted	Merle King	

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1168	2.2.7	Feb-38	1	NULL	3.3.1 The voting station should not visually present a single race spread over two pages or two columns. If on a ballot there is a race N of M where i.e. N=15 and M=40, so there are a lot of candidates, then it is infeasible (in case of a Full Face DRE)	Accepted	Merle King	
1172	2.2.7	28-Feb	7	NULL	5.2 If a voting station provides sound cues as a method to alert the voter, the tone shall be accompanied by a visual cue. and then further under: "Discussion: For instance, the station might beep if the voter attempts to overvote." This is in contradiction to address this mandate. Ideally every voter would be able to vote independently and privately, regardless of language. As a practical matter, alternative language access is mandated under	Accepted	Merle King	
1212	2.2.7	Feb-30	16	NULL	...it was suggested by our committee that the voters should have the option of having the touch screen on or off, while utilizing the audio ballot and navigation controls. For voters with no sight abilities, a blank screen is advantageous since it ensures	Accepted	Merle King	
1253	2.2.7			NULL	...one recommended addition - after the 3rd bullet point "Jurisdictions may change voting equipment, thus obviating whatever familiarity the voter might have acquired", insert additional point "Given the mobility of today's society, voters moving from one	Accepted	Merle King	
1257	2.2.7			NULL	In general, I believe the standards set forth in Sections 2-6 follow common sense precepts that, to a large degree, are already followed by election officials around the country. As you have experts here to talk about the accessibility requirements for the	Accepted	Merle King	
1297	2.2.7			NULL	I am writing to both thank you for your previous efforts to gain an accessible voting experience for those of us with disabilities and your current effort to secure the full range of voting access and privileges for all people with disabilities. irresp	Accepted	Merle King	
1683	2.2.7			NULL	1. An element that needs to be included as the first step in "access to the voting process" is accessible voter registration. There are 20.9 million voting aged citizens with disabilities who are not registered to vote, approximately 56% of the total dis	Accepted	Merle King	
1644	2.2.7			NULL		Accepted	Merle King	

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1651	2.2.7			NULL	a number of standards in the VSG continue to utilize "should" instead of "shall", including: „X Shape and color identification of buttons and controls (2.2.7.1.2.1.3) „X Sanitized headphones (2.2.7.1.2.2.3.4) „X Capacity to provide digitized (human) sp	Accepted	Merle King	
1764	2.2.7	10-Feb		NULL	The display of the numbering conventions in this section does not follow the balance of the document and ought to be corrected.	Accepted	Merle King	
2187	2.2.7			NULL	ALL ELIGIBLE VOTERS SHALL HAVE ACCESS TO THE VOTING PROCESS WITHOUT DISCRIMINATION. A. I am pleased that the guidelines require the Voting System Vendor to have the necessary connections to their equipment for the voters that wish to bring their own per	Accepted	Merle King	
2188	2.2.7			NULL	ALL ELIGIBLE VOTERS SHALL HAVE ACCESS TO THE VOTING PROCESS WITHOUT DISCRIMINATION. B. Not all voters are fully literate in English; there are voters that are able to speak English but are unable to read it. I have seen voters start voting in English an	Accepted	Merle King	
2189	2.2.7			NULL	ALL ELIGIBLE VOTERS SHALL HAVE ACCESS TO THE VOTING PROCESS WITHOUT DISCRIMINATION. In HAVA, Section 301(a)(B)(i), it allows a state that uses a paper ballot voting system to meet the requirements of notifying a voter if the voter selects more than one	Accepted	Merle King	
2191	2.2.7			NULL	EACH CAST BALLOT SHALL ACCURATELY CAPTURE THE SELECTIONS MADE BY THE VOTER. My next area of concern is the requirement for the voting system to support a process that notifies the voter if he or she has attempted to vote for fewer candidates than the m	Accepted	Merle King	
2193	2.2.7			NULL	THE VOTING PROCESS SHALL PRESERVE THE SECRECY OF THE BALLOT. A. No voting method should single out a voter, either while they are voting or after their ballot is cast. The requirement that all voting stations using paper ballots should make provisions f	Accepted	Merle King	
2194	2.2.7			NULL	THE VOTING PROCESS SHALL PRESERVE THE SECRECY OF THE BALLOT. B. Throughout the guidelines the vendor is encouraged to conduct some realistic usability tests on the final product using subject representatives of the general population and report the test	Accepted	Merle King	
2195	2.2.7			NULL	THE VOTING PROCESS SHALL PRESERVE THE SECRECY OF THE BALLOT. C. Under the section that requires the voting system to be accessible to the blind voter is the requirement for the audio system to provide information via recorded human speech rather than sy	Accepted	Merle King	

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323	2.2.7.1			ATAP Comm	There continue to be three major barriers to accessibility posed by the current draft of the VVSG which seem to compromise delivery of independent and secret voting by individuals with disabilities. 1) Equal access to paper ballots is not ensured	NULL	NULL	
1418	2.2.7.1			NULL	Guidance is needed on summative usability tests required on partially blind, blind, persons with limited motor control, persons with limited command of English, and the general population. Statements submitted at EAC public hearing, June 30, 2005, New	Accepted	Merle King	
1652	2.2.7.1			NULL	Recommendation: We recommend that the guidelines should recognize that accessibility for people with cognitive and psychiatric disabilities includes preventing the denial of access to registration and voting for individuals who have the capacity to vote.	Accepted	Merle King	
1664	2.2.7.1			NULL	To facilitate voter turnout many states are reorganizing their precincts and polling stations to create "super precincts" that combine more than one polling place. HAVA requires at least one accessible voting station for each polling place. Although this	Accepted	Merle King	
1765	2.2.7.1	12-Feb	5-Jan	NULL	This section is subject to implementation by local officials and is not testable as part of the VSTL process initiated by a voting system manufacturer, although it is clear that a system must be designed in such a way that it is capable of allowing the ele	Accepted	Merle King	
1729	2.2.7.1.1			NULL	The VVSG's approach to accessibility issues for persons with disabilities raises a number of concerns, particularly with regard to the inconsistent use of "shall" and "should" in terms of guidelines to implement the disability access requirements under s	Accepted	Merle King	
1015	2.2.7.1.1.2	13-Feb		NULL	Change Language to: "An ACC-VS should, where possible, provide accessibility to voters using their own personal assistive device, provided that such use has a standard interface and does not compromise the integrity of the voting system."	Accepted	Merle King	
1230	2.2.7.1.1.3	2-13 & 2.1	29 - 3	NULL	This seems more a voting process issue and not a voting system issue. It should be part of an Operational Guidelines section and not a voting system guideline.	Accepted	Merle King	
1073	2.2.7.1.2	13-Feb	22	NULL	For the requirement, "An Acc-VS shall provide accessibility to voters using their own personal assistive devices.", the language used is inclusive of all personal assistive devices (PADs), yet there are no standards for the interfaces of all PADS. It woul	Accepted	Merle King	

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1229	2.2.7.1.2	2.13	22-28	NULL	There are no specifications for this requirement. I do not see how a vendor can meet this standard without detailed specifications such as those provided for the visually impaired and those who lack fine motor control.	Accepted	Merle King	
1421	2.2.7.1.2			NULL	Acc-VS guidance with personal assistive devices is too broad. [Statements submitted at EAC public hearing, June 30, 2005, New York]	Accepted	Merle King	
1662	2.2.7.1.2.1.			NULL	New Guideline with "discussion" note (2.2.7.1) 2.1.10 RECOMMENDATION: Add a new guideline at position (2.2.7.1) 2.1.10: "Any voting stations that electronically determine the users vote shall provide audio confirmation of the ballot choices." Ne	Accepted	Merle King	
514	2.2.7.1.2.1.3			NULL	Recommendations Delete current 2.2.7.1.2.1.3 and replace with: "If the normal procedure includes a paper ballot, which is or can be an official vote record, visually impaired voters shall be able to vote and cast the paper ballot through an output that Ensure Equal Access to paper ballots. Delete current 2.2.7.1.2.1.3 and replace with: "If the normal procedure includes a paper ballot, which is or can be an official vote record, visually impaired voters shall be able to vote and cast the paper ballot th	Accepted	Merle King	
1645	2.2.7.1.2.1.3	15-Feb		1 NULL	The inclusion of this language allows for items such as lighting and large-print ballots. However, the discussion is misleading as it intimates that the provision of additional aids such as magnifiers would be appropriate for voters with poor reading visi	Accepted	Merle King	
1665	2.2.7.1.2.1.3			NULL	RECOMMENDATION: Use the term "monochrome" instead of "black and white only."	Accepted	Merle King	
1653	2.2.7.1.2.1.4			NULL	Replace "should" with "shall".	Accepted	Merle King	
269	2.2.7.1.2.1.8	16-Feb		10 NULL		Accepted	Carol Paquette	
1654	2.2.7.1.2.1.8			NULL	This guideline is confusing as to intent. It sounds like users should be able to figure out what the meanings are by shape or color or it means that the shape should be unique for each key. If the device includes a keyboard, does that mean that each ke Alter "should" to "shall." This is a simple alteration allowing greater usability for all voters and would be especially helpful to voters with visual impairments and to voters with cognitive disabilities. Adding the phrase 'without activation' affords a	Accepted	Merle King	
1667	2.2.7.1.2.1.8			NULL		Accepted	Merle King	

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270	2.2.7.1.2.1.9	16-Feb 17 - 19	NULL	As currently worded, this guideline allows for the audio to replace the screen display. This is not helpful to voters with partial vision. The section should be reworded as follows (asterisks indicate the revision): "Any voting station using an electro	Accepted	Carol Paquette	
1655	2.2.7.1.2.1.9		NULL	RECOMMENDATION: The discussion is to be extended somewhat to read: "The redundant cues are helpful to those with low vision. They are also helpful to individuals who may have difficulty reading the text on the screen for any other reason as well as in	Accepted	Merle King	
1668	2.2.7.1.2.1.9		NULL	ACB believes that the language in this section may not be clear. As currently worded, this guideline seems to allow for the audio to replace the screen display. This is not helpful to voters with partial vision. We humbly suggest the following language:	Accepted	Merle King	
1658	2.2.7.1.2.2.2		NULL	RECOMMENDATION: In the list, the following bullets should be added: • "Any status or warnings provided to voters" Occasionally audio cues are given. Providing controls on the these short messages would be confusing. Being able to stop them or replay them should be sufficient.	Accepted	Merle King	
1661	2.2.7.1.2.2.3		NULL	RECOMMENDATION: Add to discussion: "Stop and replay would be sufficient for audio pre	Accepted	Merle King	
1660	2.2.7.1.2.2.3		NULL	In this provision you have a shall with shoulds underneath it making it slightly ambiguous. RECOMMENDATION: You can use the strategy you used on 4.2.2 and word 2.2.3 to say: "For all voting stations that provide audio presentation of the ballot, th	Accepted	Merle King	
1671	2.2.7.1.2.2.3		NULL	ACB believes that voter comprehension and control of the audio system is tantamount to the success of this alternative system for voting. ACB recommends elimination of 2.2.7.1.2.2.3.8 and 2.2.7.1.2.2.3.9. The sections focus more on the process of the pro	Accepted	Merle King	
1656	2.2.7.1.2.2.3.4		NULL	It is not clear from this guideline whether the intention is that should relates to providing a sanitized headset or whether it refers to providing any headset at all. There is no other guideline requiring that a headset or handset be available. If it is	Accepted	Merle King	
1670	2.2.7.1.2.2.3.6		NULL	As stated by Diane Golden's comments on behalf of the Association of Assistive Technology Act Programs. The term amplification usually refers to gain rather than total output, yet the range given looks to be the end output desired. The above revision sho	Accepted	Merle King	

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381	2.2.7.1.2.2.3.8	21-Feb	2	VVSG-speed propos	This requirement, covering the production for the audio system, was the subject of extensive discussion at the Standards Board meeting. Based on those comments, and consultation with experts in audio for accessible devices at the Trace Center, I	Accepted	Carol Paquette	
1659	2.2.7.1.2.2.3.9			NULL	It might useful to get some idea for the range of reading speeds that people who are blind read at.	Accepted	Merle King	
272	2.2.7.1.2.2.6	22-Feb	1	NULL	the Acc-VS should provide should read "the Acc-VS shall provide". The sight impaired voter should always have the right to verify his/her vote if the sighted voter has that right.	Accepted	Carol Paquette	
273	2.2.7.1.2.2.6	22-Feb	1	NULL	The feed for audio verification for the blind voter must come from the vwpat printer or printer feed and not from the Acc-VS. Anything else does not provide the blind voter the same ability to verify their vote.	Accepted	Carol Paquette	
1647	2.2.7.1.2.2.6	22-Feb	3	NULL	Ensure Equal Access to paper ballots. Move/change 2.2.7.1.2.2.6 to apply to all visually impaired voters and revise to read: "If the normal procedure includes a paper ballot which is or can be the official vote record, the Acc-VS shall provide features t	Accepted	Merle King	
1672	2.2.7.1.2.2.6			NULL	With the current emphasis on VWPAT and its use as the "ballot of record" in a number of elections, it is imperative that the Acc-VS "shall" provide accessible verification for "blind and visually impaired" voters. Considering that HAVA funds are provided	Accepted	Merle King	
1731	2.2.7.1.3	13-Feb		NULL	The Commission should make clear that the secondary means used in lieu of biometric measures must be fully accessible.	Accepted	Merle King	
2139	2.2.7.1.3			NULL	The statement at Section 2.2.7.1.3, "When the primary means of voter identification or authentication uses biometric measures that require a voter to possess particular biological characteristics, the voting process shall provide a secondary means that doe	Accepted	Merle King	
1604	2.2.7.1.3.1	22-Feb	24-27	NULL	Comment: Even though the usability testing described in this section is only "recommended" and not required, caution should be used when considering placing anything like this in a standard. It will become a defacto standard, despite the lesser in	Accepted	Merle King	
1605	2.2.7.1.3.2	23-Feb	7	NULL	Comment: "The force required to activate controls and keys shall be no greater 5 lbs." Recommended change: Remove this sentence or add reference to the use of commercially available tactile switches. Rationale: Actual force requirements shoul	Accepted	Merle King	

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271	2.2.7.1.3.4	23-Feb	21	NULL	Replace "should" with "shall". Without this as a requirement "3. The voting process shall be accessible to voters who lack fine motor control or the use of their hands." is not a requirement but is voluntary only. That violates HAVA as defined on page 2-12	Accepted	Carol Paquette	
1657	2.2.7.1.3.4			NULL	The discussion adds a requirement that is not reflected in any requirement. RECOMMENDATION: Suggest that a new guideline be added: "If alternate voting mechanisms are provided, they shall provide full access to the voting process including all voting"	Accepted	Merle King	
435	2.2.7.1.3.5	24-Feb	2	NULL	Change "should" to "shall". Voter who are blind AND voters who lack fine motor control SHALL independently submit their ballot. Standards need to be the same for people who are blind or who have low vision and for people with physical disabilities.	Accepted	Merle King	
1649	2.2.7.1.3.5	24-Feb	2	NULL	: Ensure equal access to the paper voting process. Current Standard 2.2.7.1.3.5 –If the normal procedure is for voters to submit their own ballots, then the voting process should provide features that enable voters who lack fine motor control or the	Accepted	Merle King	
1673	2.2.7.1.3.5			NULL	Recommendation: Change "should" to "shall". (Note: Standard 2.2.7.1.2.2.5 is a "shall" for blind voters when the normal procedure is for voters to submit their own ballot. It needs to be a "shall" for voters who lack fine motor skills or the use of their	Accepted	Merle King	
1028	2.2.7.2	Feb-31		NULL	In the second sentence, change the "shall" to a "should."	Accepted	Merle King	
1742	2.2.7.2	Feb-31		NULL	With regard to transfiguration of names of candidates on the ballot, the VVSG merely states that a transfiguration shall be included on the ballot for written languages that do not use Roman characters. Consideration should be given to the identification of	Accepted	Merle King	
1745	2.2.7.2	Feb-30		NULL	With respect to the Voter-Verified Paper Audit Trail ("VVPAT"), it is unclear whether the VVSG intends to require an "alternative language accessible VVPAT" for voter verification purposes to apply to covered persons pursuant to the requirements establish	Accepted	Merle King	
2140	2.2.7.2			NULL	"The voting process shall be accessible to voters with visual disabilities" (2.2.7.2). After the passage of HAVA, the focus tends to be on the requirement that there must be one accessible voting station (Acc-VS) per polling place by 2006. This is a crit	Accepted	Merle King	

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1666	2.2.7.2.1			NULL	Strike the additional language "or poll worker" from sections relating to voter management of controls and output. To be a truly independent system, control of the immediate voting process environment should be available for the voter.	Accepted	Merle King	
1766	2.2.7.2.1.2	14-Feb	21-23	NULL	To ensure consistent testability, it would be helpful to include specifications for how the font size will be measured. Appendix E references measuring the size of a capital X. It would be useful to detail that specification in this section.	Accepted	Merle King	
1423	2.2.7.2.1.5			NULL	Voter control of contrast must reset after vote is cast. [Statements submitted at EAC public hearing, June 30, 2005, New York]	Accepted	Merle King	
1074	2.2.7.2.1.6	15-Feb	27	NULL	This requirement states that "On all voting stations, the default color coding shall maximize correct perception by voters and operators with color blindness.", yet there are hundreds of different types of color blindness. Some of those types of color blindness	Accepted	Merle King	
1767	2.2.7.2.1.6	15-Feb	27-28	NULL	The words "shall maximize" are not sufficiently specific to be uniformly testable. Also because there are varying types and severity of color-blindness, it would be useful to add specificity. Synchronized audio with scrolling screens could be an issue with testing. [Statements submitted at EAC public hearing, June 30, 2005, New York]	Accepted	Merle King	
1428	2.2.7.2.1.9			NULL	The term "synchronized" in this context needs definition.	Accepted	Merle King	
1769	2.2.7.2.1.9	16-Feb	17-19	NULL	It is unclear if this section requires an audio ballot for a non-English voter to be presented in English. Presumably that is not the intent but it is unclear from the wording that an audio ballot should be presented in the language of choice for the vote	Accepted	Merle King	
1788	2.2.7.2.2	Feb-31	4-Jan	NULL	At 2.2.7.2.1, the statement, "The vendor should conduct summative usability tests on the Acc-VS using partially sighted subjects and report the test results to the voting system test lab according to the Common Industry Format (CIF).]" is repeated with	Accepted	Merle King	
2141	2.2.7.2.2.1			NULL	ATI requirements will require more testing. [Statements submitted at EAC public hearing, June 30, 2005, New York]	Accepted	Merle King	
1430	2.2.7.2.2.2			NULL	Recommend considering EIA/TIA 968 Hearing Aide Compatibility rules versus ANSI C63.19. [Statements submitted at EAC public hearing, June 30, 2005, New York]	Accepted	Merle King	
1432	2.2.7.2.2.2			NULL		Accepted	Merle King	
1770	2.2.7.2.2.2.	17-Feb	27-Dec	NULL	Many, if not all, the items listed in the Discussion section would more properly be listed as subsections of the requirement.	Accepted	Merle King	
1016	2.2.7.2.2.2.3.8	21-Feb		NULL	Take out Discussion language.	Accepted	Merle King	

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				Amend Executive Board recommendations on 2.2.7.2.2.3.8. Synthesized versus Human Speech. Substitute language: "The audio system should provide information via recorded human speech, digitized speech, or synthesized speech which should be clearly enuncia	Accepted	Merle King	
1017	2.2.7.2.2.3.8	21-Feb		Recommend that EAC conduct a usability study on synthesized versus human speech.	Accepted	Merle King	
1018	2.2.7.2.2.3.8	21-Feb		Clarify language on the application of VVPAT accessibility requirements when it serves as the official ballot or is used in a recount.	Accepted	Merle King	
1020	2.2.7.2.2.6	22-Feb		Move or repeat this section in the security/VVPAT section.	Accepted	Merle King	
1021	2.2.7.2.2.6	22-Feb		Strike the VVSG sentence "If a state requires the paper record produced by the VVPAT to be the official ballot, then the Acc-VS shall provide features that enable visually impaired voters to review the paper record." in its entirety, as well as Discussion	Accepted	Merle King	
1022	2.2.7.2.2.6	22-Feb		Substitute for the first sentence of Section 2.2.6: "If the normal procedure includes VVPAT, the ACC-VS should provide audio features that enable voters who are blind or voters with an unwritten language to perform this verification."	Accepted	Merle King	
1023	2.2.7.2.2.6	22-Feb		Audio qualification to ANSI C63.19 will require more tests. [Statements submitted at EAC public hearing, June 30, 2005, New York]	Accepted	Merle King	
1431	2.2.7.2.2.3			NULL	Accepted	Merle King	
1771	2.2.7.2.2.3.1	19-Feb	12-Sep	NULL	Accepted	Merle King	
1434	2.2.7.2.2.3.3			NULL	Accepted	Merle King	
1231	2.2.7.2.2.3.4	20-Feb	12-May	NULL	Accepted	Merle King	
1669	2.2.7.2.2.3.4			NULL	Accepted	Merle King	
1772	2.2.7.2.2.3.4	20-Feb	6-May	NULL	Accepted	Merle King	
1774	2.2.7.2.2.3.5	20-Feb	13-14	NULL	Accepted	Merle King	

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1775	2.2.7.2.2.3.6	20-Feb	19-22	NULL	This section is ambiguous and would benefit from additional clarification. Specifically, "A maximum of 105 dB SPL" can mean either: (a) "A maximum volume of AT LEAST 105 dB SPL", (b) "A maximum volume NOT TO EXCEED 105 dB SPL", or (c) "A maximum	Accepted	Merle King	
1435	2.2.7.2.2.3.7			NULL	Frequency Range of 315 Hz to 10KHz will require new testing and new test equipment. [Statements submitted at EAC public hearing, June 30, 2005, New York]	Accepted	Merle King	
1777	2.2.7.2.2.3.7	20-Feb	26-27	NULL	This is not testable; at a minimum, the relative frequency responses at the limits must be given, such as "with less than 6 dB variation over this frequency range from the peak of the response curve, as measured on the A-weighted scale and according to the	Accepted	Merle King	
1232	2.2.7.2.2.3.8	21-Feb	7-Feb	NULL	I don't believe that there is consensus on this issue. Recommend that this section be stricken until the subject is better understood and that there is at least a consensus on the issue.	Accepted	Merle King	
1779	2.2.7.2.2.3.8	21-Feb	3-Feb	NULL	This item is not testable. A system that is capable of using recorded human speech is also capable of having a jurisdiction record synthesized voice regardless of the intentions of the VSTL or vendor.	Accepted	Merle King	
1436	2.2.7.2.2.3.9			NULL	Rate of speech control requires more testing and guidance on variability is needed. [Statements submitted at EAC public hearing, June 30, 2005, New York]	Accepted	Merle King	
1780	2.2.7.2.2.3.9	21-Feb	10-Sep	NULL	This section, specifically the term "reasonable limits" is subjective and not testable.	Accepted	Merle King	
1075	2.2.7.2.2.6	22-Feb	1	NULL	For this requirement, there are many issues of feasibility and usability that require more thought and supporting research to identify how to address those concerns. It may be easy to state that an automated reader can be used to convert the text on the	Accepted	Merle King	
1438	2.2.7.2.2.6			NULL	Confirmation of the blind paper ballot will require additional testing. [Statements submitted at EAC public hearing, June 30, 2005, New York]	Accepted	Merle King	
1736	2.2.7.2.2.6	22-Feb		NULL	although HAVA does not require any specific audit trail mechanism, such as a voter-verified paper audit trail (VV/PAT), to the extent that a jurisdiction includes such as part of its normal voting procedure, that audit trail mechanism shall meet the access	Accepted	Merle King	

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1738	2.2.7.2.2.6	22-Feb		NULL	Additionally, the disability access requirement of HAVA is not just limited to the blind or visually impaired. Consequently, this section must provide that the guideline "shall" provide, not just for the blind, but for any disabled voter to have the opportunity to vote.	Accepted	Merle King	
1781	2.2.7.2.2.6	22-Feb	10-Jan	NULL	Most state vvpats have passed to-date have treated the electronic record as the official ballot and the paper record as either an audit trail or an official paper record, but not the official ballot. However for those states that opt to treat the paper record as the official ballot, the proposed VVPAT [voter-verified paper audit trail], the procedure includes VVPAT [voter-verified paper audit trail], the Acc-VS should provide features that enable voters who are blind to perform this verification. If a state requires the paper record procedure.	Accepted	Merle King	
2142	2.2.7.2.2.6			NULL	Replace the word "should" with "shall." This seems to be a good approach to validating whether or not a particular system is usable to the general population.	Accepted	Merle King	
1235	2.2.7.3.1	2-34 & 2-39 - 6		NULL	With regard to usability tests, the MSG encourages the commercial vendors to conduct usability tests on the accessible voting system (Acc-VS). However, consideration should be given to identifying the responsible entities (e.g., vendors, state governments, EAC's Independent Testing Authorities).	Accepted	Merle King	
1740	2.2.7.3.1	Feb-31		NULL	With regard to usability tests, the MSG encourages commercial vendors to conduct usability tests on the ALVS. Consideration should be given to identifying the responsible entities (e.g., vendors, state governments, EAC's Independent Testing Authorities).	Accepted	Merle King	
1744	2.2.7.3.1	Feb-31		NULL	Activation force test will require many new testing fixtures. [Statements submitted at EAC public hearing, June 30, 2005, New York]	Accepted	Merle King	
1440	2.2.7.3.2			NULL	ACB applauds the use of additional instructions and materials to assist voters in the independent casting of their ballots. However, ACB believes that it is essential that these instructions and materials are available in an accessible format for individuals.	Accepted	Merle King	
1674	2.2.7.3.2			NULL	The term "tight" is not testable. The second sentence specifying the force to operate does not discuss the manner in which the voter needs to exert the force to operate the control. Presumably, pursuant to HAVA Section 301(a)(1)(A)(iii), a DRE machine passes this requirement if the voter is not permitted to overvote.	Accepted	Merle King	
1783	2.2.7.3.2	23-Feb	9-Jul	NULL		Accepted	Merle King	
1790	2.2.7.3.2.2	Feb-35	21-24	NULL		Accepted	Merle King	

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1791	2.2.7.3.2.2	Feb-37	21-22	NULL	In many cases, this will be handled by provision of physical materials external to the device at the polling place by local officials. In that sense, it may be unstable.	Accepted	Merle King	
1609	2.2.7.3.2.3	Feb-36	2-Jan	NULL	Comment: Prevents consistent navigation from one page to the next when the last contest is voted - yet the voter must now take a special action to move on to the next page of the ballot. Recommended change: "DRE voting stations shall allow the	Accepted	Merle King	
1608	2.2.7.3.3.1	Feb-34	39-41	NULL	Comment: Even though the usability testing described in this section is only "recommended" and not required, caution should be used when considering placing anything like this in a standard. It will become a de facto standard, despite the lesser i	Accepted	Merle King	
1611	2.2.7.3.3.3.1	Feb-38	2-Jan	NULL	Comment: May not be possible with font constraints, etc. This is likely a conflicting requirement. Recommended change: Remove this requirement. Rationale: Some ballots may need to go across columns or pages, if they are especially long or if this requirement needs to remain flexible. In some areas, states require full-face ballot presentations which require ballot layout to run across columns or rows.	Accepted	Merle King	
1792	2.2.7.3.3.3.1	Feb-38	2-Jan	NULL	This function is usually addressed during the local election jurisdiction's ballot layout and design process. Although an important component of ballot design, federal testing will be able to detect and confirm that the functionality is available, but not	Accepted	Merle King	
1793	2.2.7.3.3.3.2	Feb-38	10-Sep	NULL	Comment: No scrolling? In conflict with other requirements. Recommended change: Remove - allow page scrolling. Rationale: Scrolling of the ballot may be the best (or only) way to present a ballot and should not be explicitly prohibited.	Accepted	Merle King	
1613	2.2.7.3.5.1	Feb-40	18-19	NULL	Many DREs have "time outs" where if there has been no activity for a certain time period, the machine switches off. Blind and visually individuals using an ATI are especially vulnerable to this as it can take longer to access the same information via audi	Accepted	Merle King	
1675	2.2.7.3.5.3			NULL	To avoid putting undue time pressure on voters in the voting booth we recommend that this section is re-written to say that a voting machine "should not" have a set period under which a voter must take particular actions.	Accepted	Merle King	
1794	2.2.7.3.5.3	Feb-41	9-Jul	NULL	Parts of the VWSG are Non-Compliant with HAVA requirements	Accepted	Merle King	
330	2.2.7.4	Appendix C	Fourth poll	VWSG Non-Compliant with HAVA requirements and/or contradicts other parts of the VWSG	Accepted	Carol Paquette		

Section Comments Sorted by Section Number

822	2.2.7.4	Feb-42	10	Precincts can	Precincts cannot comply with the HAVA's Sec. 301(a)(3)(B) & (C) and 301 (d) mandatory use of at least one direct recording electronic voting system or other voting system equipped for individuals with disabilities at each polling place by 2006, because the	Accepted	Merle King	
1441	2.2.7.4			NULL	Wheelchairs will have to be provided to evaluate clearance requirements. [Statements submitted at EAC public hearing, June 30, 2005, New York]	Accepted	Merle King	
1676	2.2.7.4			NULL	Some of the V/PAT systems make it quite possible to "track" the Acc-VS machine and the votes cast from it leading to some significant privacy questions.	Accepted	Merle King	
1025	2.2.7.4.1	Feb-42		NULL	Strike "and polling place" on line 28.	Accepted	Merle King	
					Strike the words "and polling place." This cannot be tested and measured. Vendors have no control over polling places. Where polling place configuration is an issue for a particular voting system, the vendor should be required to provide those details to t	Accepted	Merle King	
1236	2.2.7.4.1	Feb-42	28	NULL	This requirement relates to polling place conditions which are not testable by the vendor or VSTL.	Accepted	Merle King	
1784	2.2.7.4.1	24-Feb	11-Aug	NULL	We concur with the intent, but this is a difficult requirement to test since privacy is often achieved, enhanced or compromised as a function of polling place set-up which is controlled by local election administrators.	Accepted	Merle King	
1796	2.2.7.4.1.1	Feb-42	25-26	NULL	This is difficult for the VSTL to test, especially if voters opt to use their own headphones. Compliance can be affected by the volume the voter selects as well as the set-up of the polling place by local officials.	Accepted	Merle King	
1797	2.2.7.4.1.2	Feb-42		NULL		Accepted	Merle King	
1798	2.2.7.4.1.3	Feb-43		NULL	Presumably this requirement and its equivalent from HAVA Section 301 are satisfied by a system that prohibits over-voting.	Accepted	Merle King	
					The discussion states: "To convert to millimeters, multiply by 25.4 and then round to the nearest multiple of 5." Taken literally, this is embarrassingly incorrect. As any gradeschool student knows, the rounding given in this formula has nothing to do wit	NULL	NULL	
1174	2.2.7.4.2	24-Feb	19-23	NULL	The discussion states: "To convert to millimeters, multiply by 25.4 and then round to the nearest multiple of 5." Taken literally, this is embarrassingly incorrect. As any gradeschool student knows, the rounding given in this formula has nothing to do wit	Accepted	Merle King	

Section Comments Sorted by Section Number

1650	2.2.7.4.2	44	15	NULL	Ensure privacy of paper ballots. Current Standard 2.2.7.4.2.1 – No information shall be kept within a non-paper-based Cast Vote Record that identifies any accessibility feature(s) used by a voter. (Page 2-44, line 10) Current Standard 6.8.5.3 –	Accepted	Merle King	
1076	2.2.7.4.2.1	Feb-43	10	NULL	This requirement "No information shall be kept within a non-paper-based cast vote record that identifies any accessibility feature(s) used by a voter.", is a double standard, as it is made mandatory for a non-paper based system but a paper based system get	Accepted	Merle King	
1677	2.2.7.4.2.1			NULL	This requirement is a double standard, as it is made mandatory for a non-paper based system but not for a paper based system. Automated paper ballot marking systems that may be used for people with disabilities would then be vulnerable and the casting of	Accepted	Merle King	
1800	2.2.7.4.2.1	Feb-43	11-Oct	NULL	This section (and elsewhere in the draft VVSG) uses the term "non-paper-based cast vote record" where other sections (including Section 2.2.2.2) refer to the same item as the traditional "ballot image". We believe this discrepancy ought to be corrected/ci	Accepted	Merle King	
1077	2.2.7.4.2.1.1	Feb-43	16	NULL	This requirement "No information shall be kept within a non-paper-based cast vote record that identifies any alternative language feature(s) used by a voter.", is a double standard, as it is made mandatory for a non-paper based system but a paper based sys	Accepted	Merle King	
1801	2.2.7.4.2.1.1	Feb-44		NULL	Pages 2-44 to 2-46 After Section 2.2.7.4.2.1.1 These pages are not included in the document downloaded from the EAC web site.	Accepted	Merle King	
1026	2.2.7.5.1	Feb-40		NULL	In the Discussion section, after "DRES" in last sentence, insert the words "and ballot marking devices..."	Accepted	Merle King	
1234	2.2.7.7	28-Feb	22-29	NULL	This can neither be tested or measured since there are no specifications for this guideline. It seems more a process issue: design of the ballot, instructions, etc. Thus, strike this section and provide information on ballot design, etc. in Operational Gui	Accepted	Merle King	
1444	2.2.7.7.2.1			NULL	English illiterate voter machines will require interpreters to be present during some parts of the testing. Required languages should be specified. [Statements submitted at EAC public hearing, June 30, 2005, New York]	Accepted	Merle King	
1802	2.2.8.1	Feb-47		NULL	This section includes too many functions/components under the "Vote Tabulating Program" header which ought to be addressed separately.	Accepted	Merle King	

Section Comments Sorted by Section Number

291	2.2.8.2			NULL	Suggested changes are in parenthesis: 2.2.8.2 Voting Variations There are significant variations among state election laws with respect to permissible ballot contents, voting options, and the associated ballot counting logic. The Technical Data Packa	Accepted	Carol Paquette	
1803	2.2.8.2	Feb-47		NULL	It would be helpful if, outside of these standards, these items and others could be defined and assembled in a checklist that could permit states to have the federal VSTLs conduct concurrent examinations for compliance with federal standards as well as the	Accepted	Merle King	
1906	2.3	6-Mar		NULL	124 Comment: Functionality Testing for Accessibility - this is rather open ended and left to the test lab to design and perform the test procedures Recommended change: clarify and reduce the latitude given to the labs, who are of unknown author	NULL	NULL	
2026	2.3	3-6		NULL	124 II 3-3-6 N/A Functionality Testing for Accessibility - this is rather open ended and left to the test lab to design and perform the test procedures clarify and reduce the latitude given to the labs, who are of unknown authority in this field	Accepted	Merle King	
1078	2.3.1.1.1	Feb-50		NULL	The requirement in item (e) that "All systems shall be capable of generating ballots that contain identifying codes or marks uniquely associated with each format" is understandably a requirement for optical scan paper ballots to be identified for not only	Accepted	Merle King	
1806	2.3.1.3.1	Feb-52		NULL	For consistency, it would be useful to change the term "user" to "voter". Also, subsection (c) includes paper requirements that need to be specified in documentation, but the use of which is more properly a jurisdiction-related implementation issue not	Accepted	Merle King	
708	2.3.2.4	3		NULL	[Note* Actually Volume II, Section 3] Vol 25, Sect 3 Page 3-3 In this situation, the vendor shall identify in the TDP the functional capabilities supported by new	Accepted	Merle King	
318	2.3.2.2.1	2	25	EAC Test.tff	subsystems/components and those supported by subsystems/components taken from a pre	NULL	NULL	
1807	2.3.4.1	Feb-53		NULL	Page 2-53 Section 2.3.4.1a (the second subsection (a)) How will the VSTL test to confirm that these elements are "proven to be reliable verification tools"? Also, this section needs to be renumbered for consistency.	Accepted	Merle King	
1808	2.3.5	Feb-54		NULL	Please define the phrase "upon verification of the authenticity of the command source".	Accepted	Merle King	
1907	2.4			NULL	125 No comments.	NULL	NULL	

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1809	2.4	Feb-55	NULL	We believe the intent of the drafters might be more appropriately reflected by changing the term "augment" to "increment".	Accepted	Merle King	
2027	2.4		NULL	125 II 4 All No comments.	Accepted	Merle King	
1811	2.4.1.2.1	Feb-56	NULL	These requirements are related to centrally counted paper ballots cast at the polling place, but do not apply to centrally counted mail ballots.	Accepted	Merle King	
1812	2.4.1.3	Feb-57	NULL	Page 2-57 Section 2.4.1.3(a) Why is the requirement for security at poll opening unique to DRE systems? Shouldn't this be a common requirement that also applies to paper systems?	Accepted	Merle King	
1813	2.4.2	Feb-57	NULL	Page 2-57 Section 2.4.2 b,c,d and f These are a function of the voter registration and local implementation process and are not testable by the VSTL.	Accepted	Merle King	
1814	2.4.2	Feb-57	NULL	Page 2-57 Section 2.4.2 d Why isn't this section also a requirement of precinct count paper-based systems?	Accepted	Merle King	
1815	2.4.3.3	Feb-59	NULL	The following sections should also apply to precinct count paper systems: (c), (j), (k), (l), (m), (n), (p), (q), (r), (s) and (t). [Note* Actually Volume II, Section 4] Volume 25, Sect 4 Subsections are being indented as in previous sections 4.6.4.2. Step 2: Lower the internal temperature of the chamber at any convenient rate, but not so rapidly as to cause condensation in	Accepted	Merle King	
709	2.4.6.4.2	8	NULL	Step 4: Allow the internal temperature of the chamber to return to standard laboratory conditions, at a rate not exceeding 10 degrees F per minute. See laboratory above Also in 4.6.5.2, step 4	Accepted	Merle King	
710	2.4.6.4.2	8	NULL	4.6.6.2 Step 5: Continue with the test commencing with the conditions specified for time = 0000 hours. For how many hours? Certainly not 0000	Accepted	Merle King	
711	2.4.6.6.2	10	NULL	4.7.1 This test is similar to the low temperature and high temperature tests of MIL-STD810D, Method 502.2 and Method 501.2, with test conditions that correspond to the Wrong hyphen	Accepted	Merle King	
712	2.4.7.1	11	NULL	Step 3: Power the equipment, and perform an operational status check as in **Section 4.6.1.5**. Step 4: Set the chamber temperature to 50 degrees F, observing precautions against thermal shock and **condensation**. [Correction area marked in ** **]	Accepted	Merle King	
713	2.4.7.1	11	NULL		Accepted	Merle King	

Section Comments Sorted by Section Number

714 2.4.7.4	14	NULL	Page 4-14 a. For all DRE systems: 1) Recording and storing the voter's ballot selections. b. For precinct-count systems (paper-based and DRE): 1) Consolidation of vote selection data from multiple precinct-based systems to generate jurisdiction-wide	Accepted	Merle King	
1912 2.5	9-May	NULL	130 5.4.2.r Comment: Has functions with fewer than six levels of indented scope, ... Recommended change: Has functions that are generally limited to six levels of indented scope, ... Rationale: The six level requirement is arbitrary and should	NULL	NULL	
1913 2.5	10-May	NULL	131 5.4.2.s Comment: Initializes every variable upon declaration where permitted. Recommended change: "Initializes every variable upon declaration where permitted, and where subsequent assignment is not guaranteed by program flow." Rationale	NULL	NULL	
1914 2.5	10-May	NULL	132 5.4.2.t Comment: Specifies explicit comparisons in all if() and while() conditions. Recommended change: Specifies explicit comparisons in all if() and while() conditions where the data type of the conditional expression is not Boolean or it	NULL	NULL	
1908 2.5	8-May	NULL	126 Comment: Introductory paragraph: "If the vendor does not identify an appropriate set of coding conventions in accordance with the provisions of Volume I section 4.2.6.a..." Recommended change: "If the vendor does not identify an appropriate s	NULL	NULL	
1910 2.5	9-May	NULL	128 5.4.2.k Comment: Has no line of code exceeding 80 columns in width... Recommended change: Strike this requirement Rationale: Modern display and print technology has progressed beyond the 80-character display. This restriction makes code w	NULL	NULL	
1911 2.5	9-May	NULL	129 5.4.2.q Comment: References variables by fewer than five levels of indirection... Recommended change: References variables should be limited to fewer than five levels of indirection ... Rationale: The five level requirement is arbitrary and	NULL	NULL	
1915 2.5	11-May	NULL	133 5.4.2.w Comment: Has all assert() statements coded such that they are absent from a production compilation. Recommended change: This requirement should be identified as a guideline or it should be stricken. Rationale: If a module requir	NULL	NULL	

Section Comments Sorted by Section Number

2028 2.5	8-May	NULL	126 II 5 p. 5-8 5.4.2 Introductory paragraph: "If the vendor does not identify an appropriate set of coding conventions in accordance with the provisions of Volume I section 4.2.6.a..." "If the vendor does not identify an appropriate set of coding conventions shall either be validated for type and range on entry into each unit or the unit comments shall explicitly identify the type and range for the reference of the programmer and tester. Validation may be performed"	Accepted	Merle King	
2029 2.5	8-May	NULL	127 II 5 p 5-8 5.4.2.a All parameters shall either be validated for type and range on entry into each unit or the unit comments shall explicitly identify the type and range for the reference of the programmer and tester. Validation may be performed	Accepted	Merle King	
2030 2.5	9-May	NULL	128 II 5 p 5-9 5.4.2.k Has no line of code exceeding 80 columns in width... Strike this requirement Modern display and print technology has progressed beyond the 80-character display. This restriction makes code written with descriptive variable	Accepted	Merle King	
2031 2.5	9-May	NULL	129 II 5 p 5-9 5.4.2.q References variables by fewer than five levels of indirection... References variables should be limited to fewer than five levels of indirection... The five level requirement is arbitrary and should be identified as a guideline	Accepted	Merle King	
2032 2.5	9-May	NULL	130 II 5 p 5-9 5.4.2.r Has functions with fewer than six levels of indented scope, ... Has functions that are generally limited to six levels of indented scope, ... The six level requirement is arbitrary and should be identified as a guideline. This	Accepted	Merle King	
2033 2.5	10-May	NULL	131 II 5 p 5-10 5.4.2.s Initializes every variable upon declaration where permitted. "Initializes every variable upon declaration where permitted, and where subsequent assignment is not guaranteed by program flow." Initializing a variable the	Accepted	Merle King	
2034 2.5	10-May	NULL	132 II 5 p 5-10 5.4.2.t Specifies explicit comparisons in all if() and while() conditions. Specifies explicit comparisons in all if() and while() conditions where the data type of the conditional expression is not Boolean or its equivalent. If the	Accepted	Merle King	
2035 2.5	11-May	NULL	133 II 5 p 5-11 5.4.2.w Has all assert() statements coded such that they are absent from a production compilation. This requirement should be identified as a guideline or it should be stricken. If a module requires an assert() statement to g	Accepted	Merle King	

Section Comments Sorted by Section Number

1079	2.5.1	Feb-60	NULL	This requirement in item (b) states that "The system shall provide the means for providing an internal test that verifies that the prescribed closing procedure has been followed, and that the device status is normal", but it can only be based on procedures	Accepted	Merle King	
1817	2.5.1	Feb-61	NULL	Page 2-61 Section 2.5.1(e) This section permits the re-opening of polls by an authorized person. We think the re-opening of polls on either DRE or other systems should not be permitted.	Accepted	Merle King	
1818	2.5.3.1	Feb-61	NULL	The reference in this section appears to be incorrect. Section 4.5 does not include the audit information referenced.	Accepted	Merle King	
715	2.5.4.1.2	4,6	NULL	[Note* Actually Volume II, Section 5] vol 25, sect 5 page 5-4 & 5-6 font size has been changed in parts	Accepted	Merle King	
716	2.5.4.2	8	NULL	page 5-8 For C-based languages and others to which this applies, has the return explicitly defined for callable units such as functions or procedures (do not drop through by default) and, in the case of functions, has the return value explicitly assigne	Accepted	Merle King	
1916	2.6		NULL	134 No comments.	NULL	Merle King	
2036	2.6		NULL	134 II 6 All All No comments.	Accepted	Merle King	
706	2.6.5	16	NULL	page 2-16, b. For systems that use public communications networks as defined in Volume I Section 5, this information shall also include: Should there be a comma between volume I, and section 5? (again my system numbered in error)	Accepted	Merle King	
1917	2.7		NULL	135 No comments.	NULL	Merle King	
719	2.7		NULL	[Note* Actually Volume II, Section 7] Vol 25, sect 7 That's all, folks!	Accepted	Merle King	
2037	2.7		NULL	135 II 7 All All No comments.	Accepted	Merle King	
980	202		NULL	"I want Section 6.8 to require a voter-verified paper audit trail for ALL voters and voting systems. It should be mandatory."	Accepted	Merle King	
1357	3		NULL	Certainly there is a need for a range of abilities and disabilities to be addressed by balloting systems, but to expect that all voters will satisfactorily address their individual needs using the same equipment poses a design constraint that has never been	Accepted	Merle King	
1747	3.1		NULL	It is not clear whether VVSG section 3 applies to the voter-verified paper audit trail (VVPAT), or any other verification system, as a part of the voting system. While arguably a printer could be considered part of a VVPAT system, other forms of verifcat	Accepted	Merle King	

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1319	3.2.1				Section 3.2.1 Accuracy Requirements references telecommunication data transmission for the initial tabulation of results, but it does not address the need to retain accurate information for audits or recount purposes. It should be noted in the final standard	Accepted	Merle King	
1821	3.2.1	4-Mar		NULL	The second to the last paragraph should read: "For testing purposes, the acceptable error rate is defined using two parameters: the desired error rate to be achieved, and the maximum error rate that can be accepted during the test process."	Accepted	Merle King	
2052	3.2.2.11			NULL	Paragraph 3.2.2.11a – Technical – "10 V" should be "10 V rms over the frequency range 150 kHz to 80 MHz. with an 80% amplitude modulation with a 1 kHz sine wave"	Accepted	Merle King	
2053	3.2.2.11			NULL	Paragraph 3.2.2.11a – Editorial/Technical – (10 Vrms, 20 sig/control>3 m) should read "10V, sig/control >3 m over the frequency range 150 kHz to 80 MHz. with an 80% amplitude modulation with a 1 kHz sine wave." the 20 was a mist print!	Accepted	Merle King	
1825	3.2.2.13	8-Mar		NULL	The operating temperature range ought to be expanded to ensure that equipment in locations like Arizona, Nevada and other hot climates will function when power outages occur in those regions.	Accepted	Merle King	
1827	3.2.2.14	8-Mar		NULL	Page 3-8 Section 3.2.2.14(a) Storage temperatures in many parts of the country can dip well below -4 degrees F. This temperature range should be examined.	Accepted	Merle King	
1822	3.2.2.4	5-Mar		NULL	Subsection (b) appears to end in mid-sentence.	Accepted	Merle King	
1824	3.2.2.4	6-Mar		NULL	Why exempt lighting from the requirement for back-up power? If the voter needs light to see their ballot when the power is on, presumably, that need is even greater in the event of a power outage.	Accepted	Merle King	
2045	3.2.2.4			NULL	Paragraph 3.2.2.4 a– Editorial Should read "Nominal 120 Vac/60Hz/1 phase"	Accepted	Merle King	
2046	3.2.2.4			NULL	Paragraph 3.2.2.4 b– Editorial Should read "Nominal 208 Vac/60Hz/2 phase"	Accepted	Merle King	
2047	3.2.2.5			NULL	Paragraph 3.2.2.5 Editorial – Change the word "Surges" to "voltage dip" in a, b, and c. Change the word dip in a and b to "of nominal"	Accepted	Merle King	
2048	3.2.2.6			NULL	Paragraph 3.2.2.6 – Editorial – The voltage should be + or – 2 kV for AC and DC external power lines Technical – A repetition rate of 100 kHz should be stated for the impulses.	Accepted	Merle King	
2049	3.2.2.7			NULL	Paragraph 3.2.2.7c – Editorial – Change "+ or - .5 kV" to "+ or - 0.5 kV."	Accepted	Merle King	
2050	3.2.2.7			NULL	Paragraph 3.2.2.7d – Editorial – Change "+ or - .5 kV" to "+ or - 0.5 kV."	Accepted	Merle King	

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1314	3.2.2.8			NULL	Another important factor to consider is a stronger section 3.2.2.8 Electrostatic Disruption (ESD) under guidance regarding Hardware. The effects of ESD can be devastating to the operation of electrical equipment. The recommendations to states should reflect	Accepted	Merle King	
2051	3.2.2.9			NULL	Paragraph 3.2.2.9 – Editorial – Change “Electromagnetic Radiation” to “Electromagnetic Emissions.” There is no threshold in this requirement item (f) specifying the level of stray electromagnetic emissions and internally generated spurious electrical signals to protect the election management data stored in memory. For this requirement to be met, level	Accepted	Merle King	
1080	3.2.3.1	9-Mar		NULL	Below is a table with reference to where some of the points we have raised should be addressed in The Guidelines. It also raises additional questions and points. Because we’ve called on the EAC to broaden its scope, this table cannot be complete as numerous	Accepted	Merle King	
2161	3.2.3.1			NULL	Below is a table with reference to where some of the points we have raised should be addressed in The Guidelines. It also raises additional questions and points. Because we’ve called on the EAC to broaden its scope, this table cannot be complete as numerous	Accepted	Merle King	
1828	3.2.3.2	9-Mar		NULL	It would be useful to define how the 22 month error-free data retention should be demonstrated in testable terms.	Accepted	Merle King	
1829	3.2.4.3.2	13-Mar		NULL	The subsection formatting appears to be off between subsections (c) and (d).	Accepted	Merle King	
2162	3.2.4.3.2			NULL	Below is a table with reference to where some of the points we have raised should be addressed in The Guidelines. It also raises additional questions and points. Because we’ve called on the EAC to broaden its scope, this table cannot be complete as numerous	Accepted	Merle King	
2163	3.2.4.3.2			NULL	Below is a table with reference to where some of the points we have raised should be addressed in The Guidelines. It also raises additional questions and points. Because we’ve called on the EAC to broaden its scope, this table cannot be complete as numerous	Accepted	Merle King	
2164	3.2.4.3.3			NULL	Below is a table with reference to where some of the points we have raised should be addressed in The Guidelines. It also raises additional questions and points. Because we’ve called on the EAC to broaden its scope, this table cannot be complete as numerous	Accepted	Merle King	
1831	3.2.6.1.2	18-Mar		NULL	It would be useful to define how the 22 month error-free data retention should be demonstrated in testable terms.	Accepted	Merle King	
1179	3.2.6.2.1	18-Mar		NULL	A delay of 3 seconds is not “without perceptible delay”. Computer users seeing no response for 3 seconds will generally assume that their input was missed and re-enter the choice, etc., which could cause erratic behavior for a slow DRE. In the computing f	Accepted	Merle King	

Section Comments Sorted by Section Number

2165	3.2.6.2.2			NULL	Below is a table with reference to where some of the points we have raised should be addressed in The Guidelines. It also raises additional questions and points. Because we've called on the EAC to broaden its scope, this table cannot be complete as numerou	Accepted	Merle King	
2166	3.2.6.2.2			NULL	Below is a table with reference to where some of the points we have raised should be addressed in The Guidelines. It also raises additional questions and points. Because we've called on the EAC to broaden its scope, this table cannot be complete as numerou	Accepted	Merle King	
1833	3.2.6.2.3	18-Mar		NULL	It would be useful to define how the error-free data retention should be demonstrated in testable terms.	Accepted	Merle King	
1834	3.2.7.1	18-Mar		NULL	It would be useful to define how the error-free data retention should be demonstrated in testable terms.	Accepted	Merle King	
2167	3.2.8			NULL	Below is a table with reference to where some of the points we have raised should be addressed in The Guidelines. It also raises additional questions and points. Because we've called on the EAC to broaden its scope, this table cannot be complete as numerou	Accepted	Merle King	
1835	3.3.3	21-Mar		NULL	Page 3-21 Section 3.3.3 (a) We agree with the requirement, but there is no empirical test to designate pass/fail	Accepted	Merle King	
1836	3.3.3	21-Mar		NULL	Page 3-21 Section 3.3.3 (b)(2) Stacking loads are not specified in any of the environmental tests. What methodology will a VSTL use to determine pass/fail for this requirement?	Accepted	Merle King	
1837	3.4.1	22-Mar		NULL	Page 3-22 Section 3.4.1(a) Although a worthy goal, they are not necessarily testable requirements at the VSTL level.	Accepted	Merle King	
1838	3.4.2	22-Mar		NULL	Although an appropriate objective, it is not testable in the VSTL environment.	Accepted	Merle King	
1840	3.4.3	22-Mar		NULL	We believe the Mean Time Between Failure tests are adequate for central count equipment, but ought to be revised and expanded for precinct count machinery which must be in constant operation for extended periods of time during the election day.	Accepted	Merle King	
2168	3.4.4			NULL	Below is a table with reference to where some of the points we have raised should be addressed in The Guidelines. It also raises additional questions and points. Because we've called on the EAC to broaden its scope, this table cannot be complete as numerou	Accepted	Merle King	
1842	3.4.4.1	23-Mar		NULL	Page 3-23 Section 3.4.4.1(a) The requirement for labels and test points ought to be included in the maintainability section, rather than the reliability section.	Accepted	Merle King	

Section Comments Sorted by Section Number

1081	3.4.6	25-Mar	NULL	The requirement in item (b) to "Display on each device a separate data plate containing a schedule for and list of operations required to service or to perform preventive maintenance" may require a label that, with readably sized text, is bigger than the a	Accepted	Merle King	
1082	4.1	1-Apr	NULL	For the language in the Scope "... addressing both system-level software, such as operating systems, and voting system application software, including firmware...", it would be perfectly reasonable if system level components that are not directly involved with	Accepted	Merle King	
1083	4.1.1	2-Apr	NULL	There is a contradiction between the following bullet point, "#9830: Software furnished by an external provider (for example, providers of COTS operating systems and web browsers) where the software may be used in any way during voting system operation	Accepted	Merle King	
1084	4.1.1	2-Apr	NULL	In a portion of the paragraph stating "Unmodified software is not subject to code examination; however, source code generated by a package and embedded in software modules for compilation or interpretation shall be provided in human readable form to the te	Accepted	Merle King	
1085	4.1.2	2-Apr	NULL	For the requirement "The requirements of this section apply to... regardless of the ownership of the software... ♦: Software that operates on ballot printers, vote counting devices, and other hardware typically installed at...", the intent is to cover t	Accepted	Merle King	
972	4.2.1	2-Apr	NULL	Current: The specific testing procedures to be used shall be identified in the Qualification Test Plan prepared by the test lab. Change: The specific testing procedures to be used shall be identified in the National Certification Test Plan prepar	Accepted	Merle King	
971	4.2.2	2-Apr	NULL	Current: The hardware submitted for qualification testing shall be equivalent, in form and function, to the actual production versions of the hardware units. Change: The hardware submitted for National certification testing shall be equivalent, in	Accepted	Merle King	
1843	4.2.2	4-Apr	NULL	Section 6.4e referenced in this section could not be found. Below is a table with reference to where some of the points we have raised should be addressed in The Guidelines. It also raises additional questions and points. Because we've called on the EAC to broaden its scope, this table cannot be complete	Accepted	Merle King	
2169	4.2.2		NULL	as numerou	Accepted	Merle King	

Section Comments Sorted by Section Number

2170	4.2.2		NULL	Below is a table with reference to where some of the points we have raised should be addressed in The Guidelines. It also raises additional questions and points. Because we've called on the EAC to broaden its scope, this table cannot be complete as numerou	Accepted	Merle King	
1086	4.2.3	4-Apr	NULL	The requirement "Voing system application software, including Commercial off-the-shelf (COTS) software, shall be designed in a modular fashion. However, COTS software is not required to be inspected for compliance with this requirement." contains a contra	Accepted	Merle King	
1087	4.2.3	4-Apr	NULL	In this section, there is no adequate definition of a software module. In its current state, the definition is left to the subjective opinion of the test lab. The standard should explicitly and simply state that a module is a function (in C, C++, Java, e	Accepted	Merle King	
1088	4.2.3	5-Apr	NULL	The following requirement in item (b) is not necessary, "Each module shall be uniquely and mnemonically named, using names that differ by more than a single character." There is nothing wrong with function names like "SetLimit()" and "GetLimit()". There	Accepted	Merle King	
1089	4.2.3	5-Apr	NULL	For the following requirement in item (b) "The modules shall include a set of header comments identifying the module's purpose, design, conditions, and version history, followed by operational code.", the term 'version history' should be removed as it make	Accepted	Merle King	
1090	4.2.3	5-Apr	NULL	For the requirement in item (b), "Headers are optional for modules of fewer than ten executable lines where the subject module is embedded in a larger module that has a header containing the header information.", the portion of the requirement starting wit	Accepted	Merle King	
1091	4.2.3	5-Apr	NULL	For the requirement in 4.2.3 (e), "Each module shall have a single entry point, and a single exit point, for normal process flow... the exception for the exit point is where a problem is so severe that execution cannot be resumed.", this requirement is pro	Accepted	Merle King	
1092	4.2.3	5-Apr	NULL	The requirement in item (f) "Process flow within the modules shall be restricted to combinations of the control structures defined in Volume II, Section 5.", in whole, is archaic. For further information, see "A case for the goto", Martin Hopkins, Proceed	Accepted	Merle King	

Section Comments Sorted by Section Number

1845	4.2.3	Apr-44	NULL	Page 4-4 Section 4.2.3 through 4.2.7 It is disappointing that the VVSG did not incorporate the guidance from the TGDC regarding coding conventions. In Volume II, Section 4.2.1.4 of the April work product from NIST, the TGDC/NIST offered warnings about	Accepted	Merle King	
1093	4.2.4	6-Apr	NULL	The section of the requirement in item (d), "Operator intervention or logic that evaluates received or stored data shall not re-direct program control within a program routine." is a carry over from the VSS 2002 standards and is considered non-sequitor. R	Accepted	Merle King	
1094	4.2.4	6-Apr	NULL	The language in item (d) "(due to abnormal error conditions)" should be removed as a condition for using exception handlers. It is acceptable to have the language in the following sentence "... and intentional exceptions (used as GoTos) are prohibited;" as t	Accepted	Merle King	
1095	4.2.5	6-Apr	NULL	In respect to the requirement in item (c) "Names shall be unique within an application.", in fact, names do not have to be exclusively unique in an application. A name like "count" will get re-used many times in a large application. Proposed change: R	Accepted	Merle King	
1096	4.2.5	6-Apr	NULL	The following requirement in item (c) is not necessary, "Names shall differ by more than a single character." There is nothing wrong with function names like "SetLimit()" and "GetLimit()". There is nothing ambiguous about names that differ by one character	Accepted	Merle King	
1097	4.2.5	6-Apr	NULL	In respect to the requirement in item (c), "All single-character names are forbidden except those for variables used as loop indexes.", the variable names 'x' and 'y' are perfectly reasonable (and normal) variable names for coordinates. However with the c	Accepted	Merle King	
1098	4.2.5	6-Apr	NULL	Regarding the requirement in item (c) "In large systems where subsystems tend to be developed independently, duplicate names may be used where the scope of the name is unique within the application. Names should always be unique where modules are shared; a	Accepted	Merle King	
1785	4.2.5	27-Feb	19-23	The term "easily legible" is not testable.	Accepted	Merle King	
1099	4.2.7	7-Apr	NULL	There are many issues with section 4.2.7 as outlined in our other comments regarding this section. For all the intents and purposes of section 4.2.7, it could simply be replaced with the requirement "All functions over 10 lines must contain a comment hea	Accepted	Merle King	

Section Comments Sorted by Section Number

1100	4.2.7	7-Apr	NULL	In this requirement in item (a), the first sentence "All modules shall contain headers." should be removed. Short functions shouldn't require headers. One line functions, where the "purpose, design and conditions" are plainly self explanatory, don't requ	Accepted	Merle King	
1101	4.2.7	7-Apr	NULL	In respect to the requirement in item (a)(2), "Other units called and the calling sequence.", this requirement is burdensome and serves little rational purpose. It should be removed. If it is not removed, then at least an exception should be made to allo	Accepted	Merle King	
1102	4.2.7	7-Apr	NULL	In respect to this requirement in item (a)(6), "Date of creation and a revision record.", the revision history should be in separate document outside of the source code, not in the function header comments. Revision history should be on a per file basis,	Accepted	Merle King	
1103	4.2.7	7-Apr	NULL	In respect to the requirement in item (b), "All variables shall have comments at the point of declaration clearly explaining...", there needs to be a qualification that reads "except where the purpose of the variable is made explicit by its name". Otherwi	Accepted	Merle King	
1846	4.3	8-Apr	NULL	It would be useful to delineate the tests used to demonstrate compliance with this section.	Accepted	Merle King	
1104	4.4.2	9-Apr	NULL	The requirement in item (g) that "for systems that use a public network, provide a report of test ballots that includes: 1) Number of ballots sent; 2) When each ballot was sent; 3) Machine from which each ballot was sent; and 4) Specific votes or selectio	Accepted	Merle King	
2171	4.4.2		NULL	Below is a table with reference to where some of the points we have raised should be addressed in The Guidelines. It also raises additional questions and points. Because we've called on the EAC to broaden its scope, this table cannot be complete as numerou	Accepted	Merle King	
2172	4.4.3		NULL	Below is a table with reference to where some of the points we have raised should be addressed in The Guidelines. It also raises additional questions and points. Because we've called on the EAC to broaden its scope, this table cannot be complete as numerou	Accepted	Merle King	
2173	4.4.4		NULL	Below is a table with reference to where some of the points we have raised should be addressed in The Guidelines. It also raises additional questions and points. Because we've called on the EAC to broaden its scope, this table cannot be complete as numerou	Accepted	Merle King	

Section Comments Sorted by Section Number

975	4.7.2	13-Apr	Vol II	NULL	Current: Should significant impediments or difficulties be encountered that are not remedied by the vendor, the test lab shall include such findings in the qualification test results of the certification test report. Change: Should significant imp	Accepted	Merle King	
1892	4.7.2	13-Apr		NULL	Volume II Section 4.7.2, Page 4-13 The term "significant" is not testable.	Accepted	Merle King	
1894	4.7.3	13-Apr		NULL	Volume II Section 4.7.3, Page 4-13 We believe the Mean Time Between Failure tests are adequate for central count equipment, but ought to be revised and expanded for precinct count machinery which must be in constant operation for extended periods of time	Accepted	Merle King	
976	4.7.4	14-Apr	Vol II	NULL	Current: This model shall be prepared by the vendor, and shall be validated by the ITA. Change: This model shall be prepared by the vendor, and shall be validated by the voting system testing laboratory. Nature of Change: Deprecated term	Accepted	Merle King	
1895	4.8	14-Apr		NULL	Volume II Section 4.8, Page 4-14 The usability of this section can be enhanced by consolidating it with the requirement outlined in Volume I Section 3.2.2. That would enable the test procedures and the test limits to be located in one place.	Accepted	Merle King	
1909	5	5		NULL	127 Comment: All parameters shall either be validated for type and range on entry into each unit or the unit comments shall explicitly identify the type and range for the reference of the programmer and tester. Validation may be performed implicitly	NULL	NULL	
1311	5			NULL	Volume 1, Section 5 Telecommunications Requirements for accuracy, durability, reliability, maintenance, and availability should make mention of the section on security. [Statements submitted at EAC public hearing, August 23, 2005, Denver]	Accepted	Merle King	
1349	5			NULL	The introduction of the use of telecommunications (as per Volume 1, Section 5) further compounds the nature of voting system risks far beyond that which has ever been seen or experienced in U.S. elections. The VWSG permits the use of telecommunications dev	Accepted	Merle King	
332	5.1		second to	NULL	Recommend changing "corollary" to "analogous". Rationale: More precise.	Accepted	Carol Paquette	
1787	5.1	28-Feb	3-Jan	NULL	The reference to Section 2.2.7.1.2.2.3 was difficult to locate due to the formatting of numbering conventions -- presumably, this section references the portion that begins on Page 2-19 line 4.	Accepted	Merle King	

Section Comments Sorted by Section Number

1848	5.2	5-May	NULL	Presumably the subset of the standards listed in Section 5.2 which are otherwise included in Section 3 are listed here for additional emphasis, but are not intended to replace the standards in Section 3 or exempt Data Transmission from the other elements o	Accepted	Merle King	
2174	5.2.6		NULL	Below is a table with reference to where some of the points we have raised should be addressed in The Guidelines. It also raises additional questions and points. Because we've called on the EAC to broaden its scope, this table cannot be complete as numerou	Accepted	Merle King	
1143	5.4.1	(Vol 2) 5-3	NULL	As discussed in Volume 1, the standard should allow explicitly for structured exceptions as an allowed control construct. Structured exceptions are an integral part of C++, C#, and Java languages. Proposed change: Add structured exceptions to the all	Accepted	Merle King	
1144	5.4.1	(Vol 2) 5-6	NULL	In reference to Fig. 4-5, there is no defensible reason to preclude case fall-through, and it should be specifically allowed. See also comment referring to Vol. 2, Section 5.4.2(f). Proposed change: Provide an illustration of a case fall-through.	Accepted	Merle King	
1140	5.4.2	(Vol 2) 5-10	NULL	For this requirement in Vol.2, Section 5.4.2, Item (s) "initializes every variable upon declaration where permitted", initializing all variables at declaration is inefficient and error prone. In fact, it defeats compiler warnings that would otherwise noti	Accepted	Merle King	
1145	5.4.2	(Vol 2) 5-9	NULL	In regard to the requirement in item (f), "For those languages supporting case statements, has a default choice explicitly defined to catch values not included in the case list", this is non-sequitur, because it is common for the default case to do nothing	Accepted	Merle King	
1146	5.4.2	(Vol 2)	NULL	For the requirement in item (k), "Has no line of code exceeding 80 columns in width (including comments and tab expansions) without justification.", 80 columns are not enough for modern object-oriented development with liberal comments. This is simply a h	Accepted	Merle King	
1147	5.4.2	(Vol 2) 5-9	NULL	For the requirement in item (n), "Avoids mixed-mode operations. If mixed mode usage is necessary, then all uses shall be identified and clearly explained by comments.", there is no clear identification of what "mixed-mode operation" means. Proposed chan	Accepted	Merle King	

Section Comments Sorted by Section Number

1148	5.4.2	(Vol 2) 5-10	NULL	For the requirement in item (i), "Specifies explicit comparisons in all (f) and while() conditions. For instance, i. if(flag) prohibited, and shall be written in the format ii. if (flag == TRUE)", this requirement is logically TRUE". Volume II Section 5.4.2 As referenced in our comments related to Volume I Section 4.2.3 through 4.2.7, it would be wise to adopt the guidance of the TGDC/NIST regarding coding conventions. That original guidance was included in the April draft from N	Accepted	Merle King	
1896	5.4.2		NULL		Accepted	Merle King	
1037	6	3	NULL	After narrative discussion security, after the word 'inviolability,' insert the following sentence: "Security measures should be based on a risk assessment of the specific voting system and the procedures used to operate the system. [Ultimately...]" Further, Volume 1, Section 6 Security, should offer strong caution against the use of telecommunications systems to transmit information related to critical components of voting systems before, during, or after an election. The section on security should a	Accepted	Merle King	
1313	6		NULL		Accepted	Merle King	
1315	6		NULL	It is our strong recommendation that the final guidance issued to states direct them to prepare realistic contingency plans in the event of electronic voting system failures that jeopardize the completion of the election process. Appendix C's sections 6.7. Volume 1, Section 6 Security, recommends the incorporation of infrared (IR) technology in voting systems. We strongly recommend that IR technology not be allowed in voting systems. The Voluntary Voting System Guidelines should place the strong language reg	Accepted	Merle King	
1318	6		NULL		Accepted	Merle King	
1323	6	54	interpretation	[Comment 1 of 4] Live auditing techniques are crucial to verify voting system accuracy during the live election. The attached proposed addition to the VVSG describes the use of statistical live auditing techniques to verify that paper ballots or pap	Accepted	Merle King	
1325	6	54	tabulation-liv cont	[Comment 2 of 4] Live auditing techniques can be used to verify the accuracy of the cast vote record tabulation process during the live election. The attached proposed addition to the VVSG describes one method for doing so. The attached file	Accepted	Merle King	

Section Comments Sorted by Section Number

1326	6				[Comment 3 of 4] Overview of Live Auditing Procedures for Incorporation in the Voluntary Voting System Guidelines The proposed Voluntary Voting System Guidelines are missing guidelines for live auditing, and should include them. "Live live-audit-over auditing"	Accepted	Merle King	
1348	6				Failure to adequately mitigate insider risks Elections exist in an inherently adversarial environment where insiders have both opportunity and motive. One need only look to the history of the United States to find considerable and ongoing evidence of el Voiting system security continues to fail to be addressed in terms of the more stringent controls that are applied in a broad range of critical technology applications (such as military uses, banking, aviation, and health care). One would think that with N	Accepted	Merle King	
1351	6				NULL	Accepted	Merle King	
1932	6				CERTIFICATION PROCESS: The current process for voting system certification is almost worthless for security. The process itself has to be made much more stringent. In particular, security evaluations should be conducted by experts not chosen by the verdo	Accepted	Merle King	
1991	6				Live auditing techniques can be used to verify the accuracy of the cast vote record tabulation process during the live election. The following proposed addition to the VVSG describes one method for doing so. 6.10 Requirements for Live Auditing of In this requirement in item (a), the terms "person" and "individual" are used to describe the operators of the system, yet these terms don't properly define the intent of the requirement, which is to identify the operator's specific functional role. There	Accepted	Merle King	
1105	6.2.2			6	NULL	Accepted	Merle King	
1106	6.2.2			6	In this requirement in item (b), the terms "person" and "individual" are used to describe the operators of the system, yet these terms don't properly define the intent of the requirement, which is to identify the operator's specific functional role. There	Accepted	Merle King	
1849	6.2.2			6	Volume I Section 6 Page 6 Section 6.2.2 Section 6.2.2(a) is unclear, but presumably this relates to the existence of a process for jurisdictions to log access by their personnel and includes a description of the access levels permitted.	Accepted	Merle King	

Section Comments Sorted by Section Number

2175 6.2.2			NULL	Below is a table with reference to where some of the points we have raised should be addressed in The Guidelines. It also raises additional questions and points. Because we've called on the EAC to broaden its scope, this table cannot be complete as numerous	Accepted	Merle King	
1034 6.4			NULL	Software Security Encourage EAC and NIST to develop procedures that would enable state and local election officials to easily compare voting machine software escrowed with National Software Reference Library. Current: The ITA shall conduct tests of system capabilities and review the access control policies and procedures and submitted by the vendor to identify and verify the access control features implemented as a function of the system. For those access co	Accepted	Merle King	
977 6.4.1	4-Jun	Vol II	NULL	Volume I Section 6, Page 7-8 Section 6.4.1a Firmware does not necessarily reside on a ROM.	Accepted	Merle King	
1850 6.4.1	8-Jul		NULL	This section should contain a statement for jurisdictions to independently (out of the view of vendors) to perform the check. A standard process should be established for this county by county process.	Accepted	Merle King	
426 6.4.2	9		9 NULL	EAC should consider stronger standards for protection of voting systems from logic bombs.	Accepted	Merle King	
1035 6.4.2	9		NULL	This line should read - The vendor and the jurisdiction shall independently...	Accepted	Merle King	
425 6.4.4	10		1 NULL	The use of "write-once" here and throughout this document is intended to mean "unalterable storage". It would be appropriate to define and use "unalterable storage" as write-once media that once written shall not contain "blank" writeable blocks and shall	Accepted	Merle King	
1207 6.4.4.5	11		24 NULL	The requirement, "The testing authority shall retain this record until the voting system ceases to be nationally certified." does not specify how the testing lab will physically store the source code and executable archive. There must be criteria specific to make this section more understandable to a reader new to the voting guidelines, recommend adding a discussion paragraph explaining the fact that the subset does not contain the third party software that may have associated licensing issues.	Accepted	Merle King	
1107 6.4.4.6	12		1 NULL		Accepted	Merle King	
333 6.4.4.7			NULL		Accepted	Carol Paquette	

Section Comments Sorted by Section Number

1108	6.4.4.9	12	21	NULL	In regards to the requirement, "The testing authority shall retain a copy, send a copy to the vendor, and send a copy to the NIST National Software Reference Library (NSRL)1 and/or to any other repository named by the Election Assistance Commission." the	Accepted	Merle King	
1109	6.4.5.2	14	14	NULL	In this requirement, "The NSRL or other EAC designated repository shall generate reference information in at least one of the following forms: (a) complete binary images," the complete binary image cannot be posted to a public website for verification of i	Accepted	Merle King	
659	6.4.5.5.6	17		NULL	[Note* Actually section 6.4.5.5.6] 6.4.5.5.6 6.4.4.1.1 The NSRL or other EAC designated repository shall document to whom they provide write-once media containing their public keys used to verify digital signature reference information including at a m	Accepted	Merle King	
1110	6.4.6.2	18	3	NULL	Regarding the requirement, "The vendor shall have a process to verify that the correct software is loaded, that there is no unauthorized software, and that static and semi-static voting system software on voting equipment has not been modified using the re	Accepted	Merle King	
1852	6.4.6.2.1	18		NULL	Volume I Section 6, Page 18 Section 6.4.6.2.1 Please explain how this is feasible for a spectrum of voting system components that range from an embedded system with firmware on soldered-in ROM chips to a server running the election management database s	Accepted	Merle King	
1111	6.4.6.3.1	19	1	NULL	There is a contradiction between the following requirements: "6.4.6.2.1 The process used to verify software should be possible to perform without using software installed on the voting system.", and "6.4.6.3.1 The verification process shal	Accepted	Merle King	
1112	6.4.6.3.3	19	13	NULL	In this requirement, "The verification process shall either (a) use reference information on "write-once" media received from the repository", the repository should not be able to distribute the vendor's software without the written authorization of the ve	Accepted	Merle King	
1113	6.4.6.3.4	19	20	NULL	Regarding the requirement, "Voting system equipment shall provide a read-only external interface to access the software on the system.", voting systems are designed not to have ports that could allow access to the installed software as those ports could be	Accepted	Merle King	

Section Comments Sorted by Section Number

1853	6.4.6.3.4	18	NULL	Volume I Section 6, Page 18 Section 6.4.6.3.4 Tabulation and reporting software is usually designed to run on a client/server database system using COTS servers and workstations. These requirements appear to disallow such COTS components.	Accepted	Merle King	
334	6.5.4.2		NULL	(Protective software) Nowhere in the guidelines is there any discussion about protective hardware, e.g., firewalls, intrusion detection systems, etc. A system vendor could supply a third-party piece of hardware that would satisfy the security requirement.	Accepted	Carol Paquette	
267	6.5.5		NULL	Item (d) of this section, while surely well-intentioned, is in my opinion an infeasible requirement. Particularly, "precluding data leakage through shared system resources" is nearly if not completely impossible. I would love to see a requirement that voti	Accepted	administrator	
1160	6.5.5		NULL	It is an unacceptable security risk to have election software run on anything other than a dedicated machine.	Accepted	Merle King	
266	6.6		NULL	While I applaud the requirements in section 6.7.2.1 (requiring documentation and verification of wireless communication capabilities), I believe that section 6.6 should have a similar subsection. As a network security researcher, I am well aware that wired	Accepted	administrator	
335	6.6.1		NULL	Although the wireless section includes encryption of all data transmitted, transmission over the public network does not. Recommend adding this as a requirement to ensure data integrity during transmission. Digital signatures in and of themselves, do not	Accepted	Carol Paquette	
1038	6.7	26	NULL	In lines 4 and 5, remove sentence: "The use of wireless technology introduces severe risk and should be approached with extreme caution." in its entirety.	Accepted	Merle King	
1161	6.7		NULL	There is no reason to use wireless components in a voting system. They present an unacceptable security risk.	Accepted	Merle King	
1033	6.7		NULL	Substitute for Executive Board Section 6.7 Wireless recommendation. "Recommend to the EAC to recognize a distinction between the wireless transmission of unofficial results versus official results. This distinction should replace the current discussion se	Accepted	Merle King	
1258	6.7		NULL	Vol. I, 6.7 "Wireless Requirements" "This section provides wireless requirements for implementing and using wireless capabilities within a voting system. These requirements reduce, but don't eliminate, the risk of using wireless communications for voting	Accepted	Merle King	

Section Comments Sorted by Section Number

1749	6.7			NULL	In general, the VMSG issues appropriate cautions with regard to the development and deployment of wireless communication for voting purposes. HAVA recognized the potential that the Internet and wireless technology holds for expanding both access to the ball	Accepted	Merle King	
1577	6.7			NULL	The draft VMSG guards against the possibility of tampering by. The requirements providing these protections are contained in: 6.7.2 Controlling Usage 6.7.3 Identifying Usage 6.7.10 Authentication... The controlled and limited use of wireless is a critical	Accepted	Merle King	
1854	6.7		25	NULL	Volume I Section 6, Page 25 Section 6.7 The definition used in paragraph two would incorporate laser-light such as that used in CD-ROM, CD-R and DVD devices. Presumably, that is not the intent of this section. A clarification/definition of the purpose	Accepted	Merle King	
1897	6.7	7-Jun		NULL	Volume II Section 6.7(b) Page 6-7 This section references a "Diagnostic Testing Manual", but the VMSG does not appear to define the contents/scope of that manual.	Accepted	Merle King	
1930	6.7			NULL	WIRELESS NETWORKING: The guidelines as drafted allow wireless networking, which opens up security threats. Despite the inclusion of items requiring documentation and justifications for the use of wireless, the inevitable consequence of allowing it is that	Accepted	Merle King	
1114	6.7.2.1.3.1	28		NULL	In this requirement, "This review [of the wireless documentation] shall be done either through an open and public review or by a subject area recognized expert." implies that the accredited test lab does not have the capability to conduct a test against th	Accepted	Merle King	
1445	6.7.2.1.3.1			NULL	Wireless documentation must be reviewed by a "subject area recognized expert". These will need to be identified. [Statements submitted at EAC public hearing, June 30, 2005, New York]	Accepted	Merle King	
1447	6.7.2.3			NULL	Duplication of wireless and non-wireless capabilities will double testing time. [Statements submitted at EAC public hearing, June 30, 2005, New York]	Accepted	Merle King	
1578	6.7.2.6			NULL	The next topic is the control of the wireless link. Section 6.7.2.6 requires: 6.7.2.6 If a voting system includes wireless capabilities, then the system shall have the ability to turn on the wireless capability when it is to be used and to turn off the wir	Accepted	Merle King	

Section Comments Sorted by Section Number

1570 6.7.4			NULL	Confidentiality of the transmitted data is the next point of concern. This issue is dealt with in Section 6.7.4, "Protecting the Transmitted Data". The requirements of Section 6.7.4 are: 6.7.5 All information transmitted via wireless communications shall b	Accepted	Merle King	
1115 6.7.5	31	19	NULL	In the requirement, the language "All information transmitted via wireless communications shall be encrypted and authenticated," could be interpreted to apply to the communication of infra-red paper out sensors, which only provides either a high or low swi	Accepted	Merle King	
1855 6.7.5	31		NULL	Volume I Section 6 Page 31, Section 6.7.5 and Page 32, Section 6.7.5.2.1 Wireless T-coil coupling is a low-frequency magnetic coupling and as such, is outside the definition of wireless specified in Section 6.7.	Accepted	Merle King	
1449 6.7.5.1			NULL	Encryption verification will also require an expert in the field. [Statements submitted at EAC public hearing, June 30, 2005, New York]	Accepted	Merle King	
1116 6.7.5.2	32	1	NULL	In this requirement, the language "The capability to transmit non-encrypted and non-authenticated information via wireless communications shall not exist," could be interpreted to apply to the communication of infra-red paper out sensors, which only provide	Accepted	Merle King	
1564 6.7.6			NULL	Taking the concerns for denial of service, confidentiality and tampering in reverse order, we begin by examining the safeguards provided for denial of service. Section 6.7.6 is specifically provided to mitigate the effects of a denial of service attack. Th	Accepted	Merle King	
1857 6.7.6	32		NULL	Volume I Section 6 Page 32, Section 6.7.6 This section includes the term "audible" although the definition of wireless in Section 6.7 does not cover audible in the definition of wireless.	Accepted	Merle King	
1858 6.7.6.4	33		NULL	Volume I Section 6 Page 33, Section 6.7.6.4 Based on the discussion, it appears this section would be more appropriately included in Section 2.2.7 of the VVSG.	Accepted	Merle King	
282 6.8	36	8	NULL	Move this Section to Section 2 where it belongs and not under Security where it is out of place.	NULL	NULL	
1150 6.8			NULL	I feel that this section MUST be corrected to make voter verified paper ballots mandatory for ALL voting systems. This will REQUIRE a voter -verified paper audit trail , not leaving it up to chance, or to the discretion of the states	NULL	NULL	

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1057 6.8				NULL	I want Section 6.8 to require a voter-verified paper audit trail for ALL voters and voting systems. It should be mandatory. I am concerned that new voting systems will make it difficult to confirm vote counts and create doubts about the validity of the vote.	NULL	NULL	
1296 6.8				NULL	The voter-verified, paper ballot is a MUST, in cannot be optional	NULL	NULL	
290 6.8		36	8	NULL	Move this Section to Section 2 where it belongs and not under Security where it is out of place and seems to be hidden. Basically, I believe very strongly that any form of electronic voting device MUST have a paper backup if there is to be free and fair elections. I appreciate technology, but as we all know, when it doesn't work there needs to be a manual way of doing the	Accepted	Carol Paquette	
728 6.8				NULL	must require mandatory voter-verified paper audit trail for ALL voters and voting systems.	Accepted	Merle King	
1013 6.8				NULL	Restore the confidence of the American Voter in the Voting System. Section 6.8 must require mandatory voter-verified paper audit trail for ALL voters and voting systems. There have been too many allegations AND demonstrations of voting fraud since 2000.	Accepted	Merle King	
1059 6.8				NULL	It is absurd that the voter-verified paper audit trail is "optional" under the proposed guidelines. It should be mandatory. A democracy is not a democracy without a permanent, hard-copy voting record that can be audited outside of the electronic systems us	Accepted	Merle King	
1060 6.8				NULL	I want Section 6.8 to require a voter-verified paper audit trail for ALL voters and voting systems. It must be mandatory.	Accepted	Merle King	
1062 6.8				NULL	I believe that this section should require MANDATORY voter-verified paper audit trail for ALL voters and a MANDATORY voter-verified paper audit trail for ALL voting systems.	Accepted	Merle King	
1063 6.8				NULL	Section 6.8 - should have a mandatory requirement for a voter-verified paper ballot. In case of any discrepancy between the paper ballot and an electronic ballot, the voter-verified paper ballot shall be counted as the legal vote and shall take precedence	Accepted	Merle King	
1064 6.8				NULL	Currently, a paper trail is shown as optional. It should be made mandatory. There are too many ways for computer fraud and where there are close races, there is no way to confirm that the electronic form accurately represents the wishes of the voters	Accepted	Merle King	
1066 6.8				NULL	usi	Accepted	Merle King	

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1125 6.8			NULL	The California Election Protection Network, a non-partisan organization of over 25 groups coming together to achieve their mutual election integrity goals, requests that Section 6.8 be amended to require the following: Gold Star Audit Protocol (in honor	Accepted	Merle King	
1151 6.8			NULL	In the name of George Washington, Abraham Lincoln, Susan B. Anthony, Martin Luther King and me, I strongly submit that every citizen's vote should be recorded by a voter verified paper audit trail. This minimal failsafe should not be an option.	Accepted	Merle King	
1152 6.8			NULL	A voter verified paper trail must be mandatory, not optional. Thanks for your consideration	Accepted	Merle King	
1052 6.8			NULL	I want Section 6.8 to require a voter-verified paper audit trail for ALL voters and voting systems. It must be mandatory.	Accepted	Merle King	
1054 6.8			NULL	I want Section 6.8 to require a voter-verified paper audit trail for ALL voters and voting systems. It should be mandatory. The current proposal does NOT require voter-verified paper audit trail.	Accepted	Merle King	
1055 6.8			NULL	I want Section 6.8 to require a voter-verified paper audit trail for ALL voters and voting systems. It should be mandatory.	Accepted	Merle King	
1162 6.8			NULL	A WVPAT or WVPB should not be optional. Current DREs do not provide the ability to have an independent audit of the vote. If security is broken, there is no way to tell in many cases.	Accepted	Merle King	
1175 6.8			NULL	I want Section 6.8 to require a voter-verified paper audit trail for ALL voters and voting systems. It should be mandatory	Accepted	Merle King	
1203 6.8			NULL	I want Section 6.8 to require a voter-verified paper audit trail for ALL voters and voting systems. It needs to be mandatory	Accepted	Merle King	
1233 6.8			NULL	Please require a voter-verified paper audit trail for all voters, elections and voting systems. This needs to be mandatory in order to avoid the problems of the last two general elections. Thank you.	Accepted	Merle King	
1251 6.8			NULL	I would prefer that paper trail verification be mandatory for all computer-based voting machines, and that a requirement be added that would make the paper ballot the ballot of record in the case of recounts or outcome disputes.	Accepted	Merle King	
1254 6.8			NULL	I want Section 6.8 to require a voter-verified paper audit trail for ALL voters and voting systems. It should be mandatory	Accepted	Merle King	

Section Comments Sorted by Section Number

1255 6.8		opening st	NULL	This portion is considered "Optional". It CANNOT be optional to have voter VERIFIED and Randomly COUNTED paper ballots. Unless we have this, everything else is useless. A machine checking itself is like the fox guarding the chicken coup. It is illogic	Accepted	Merle King	
1288 6.8			NULL	I want Section 6.8 to require a voter-verified paper audit trail for ALL voters and voting systems. It should be mandatory. This is a democracy, at least in word. If we really want a true emocracy, we need a voter-verified paper trail for our voting machines. This needs to be mandatory in ALL 50 states for ALL elections.	Accepted	Merle King	
1289 6.8			NULL	"I want Section 6.8 to require a voter-verified paper audit trail for ALL voters and voting systems. It should be mandatory."	Accepted	Merle King	
1056 6.8			NULL	I want Section 6.8 to require a voter-verified paper audit trail for ALL voters and voting systems. It should be mandatory.	Accepted	Merle King	
1259 6.8			NULL	The 2 major problems are: Section 6.8 :Voter Verified Paper Ballot is considered OPTIONAL!!! Please make a comment saying this is a MUST - use your own words - it can short, but it is absolutely IMPERATIVE that as many of us make our comments today!	Accepted	Merle King	
1290 6.8			NULL	Please enter this comment into the public record for the Voluntary Voting System Guidelines. The technology community, including whistle-blowers from Diebold have confirmed that the electronic voting systems being deployed throughout the US are highly s	Accepted	Merle King	
1293 6.8			NULL	We ordinary citizens place our faith in elections. As one of those who looked closely at the process, my faith has been greatly diminished when I saw how the last elections took place. Even my own Supervisor of elections told me she could not look me in	Accepted	Merle King	
1137 6.8			NULL	Paper receipts must be mandatory in order for me to have confidence that my vote(s) will be counted, and done so correctly. I want much more accountability in our voting process, not less.	Accepted	Merle King	
1205 6.8			NULL	I want Section 6.8 to require a voter-verified paper audit trail for ALL voters and voting systems. It should be mandatory. Private corporations with proprietary electronic coding must produce a voter-verified paper receipt/ballot that can be hand-tailed	Accepted	Merle King	
1206 6.8			NULL		Accepted	Merle King	

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1208	6.8		NULL	If our elections are to be both the definition of our democracy and the finest example of how our democracy works, then Section 6.8 must require a voter-verified paper audit trail for ALL voters and voting systems. Anything less is just plain un-American	Accepted	Merle King	
1249	6.8		NULL	A voter verified paper trail should be required for all voters and systems nationwide! Additionally, each should be hand counted. Other countries EASILY perform this function, why shouldn't we as well?	Accepted	Merle King	
1328	6.8		NULL	I want Section 6.8 to require a voter-verified > paper audit trail for ALL voters and voting systems. > It should be mandatory.	Accepted	Merle King	
1336	6.8		NULL	Voter Verified Paper Ballot should be mandatory, not optional. The CALIFORNIA ELECTION PROTECTION NETWORK, a non-partisan organization of over 25 groups coming together to achieve their mutual election integrity goals has voted as follows: In honor of all those who have given their lives in the	Accepted	Merle King	
1292	6.8	36	9	CEPN Gold name of democracy, w Volume 1, Section 6.8 Requirements for Voter Verified Paper Audit Trail [(VVPAT)] (Optional), begs the question, why was this particular topic labeled as "Optional"? Further, why was the sentence "VVPAT is not mandatory" included. There are 24 states, whic	Accepted	Merle King	
1321	6.8		NULL	I want Section 6.8 to require a voter-verified paper audit trail for ALL voters and voting systems. In addition, I would also like to say that there is ample evidence in the professional literature that electronic voting machines as they are today in th	Accepted	Merle King	
1364	6.8		NULL	I want Section 6.8 to require a voter-verified paper audit trail for ALL voters and voting systems. It should be mandatory.	Accepted	Merle King	
1369	6.8		NULL	I want Section 6.8 to require a voter-verified paper audit trail for ALL voters and voting systems. It needs to be mandatory otherwise you risk the possibility of voter fraud.	Accepted	Merle King	
1374	6.8		NULL	"I want Section 6.8 to require a voter-verified paper audit trail for ALL voters and voting systems. It should be mandatory." I want the paper audit trail as the "legal vote" ie: it is what counts as a vote, not the electronic count	Accepted	Merle King	
1375	6.8		NULL	Applicability is ambiguous -- which in the circumstances, invites conflict and litigation. Text states that 6.8 is applicable only if the "state decides to require" VVAT. What if state permits, but does not require it? What if Federal or local jurisdiction	Accepted	Merle King	
1380	6.8	36	12-Sep	NULL	Accepted	Merle King	

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1451 6.8			NULL	VPAT testing poses no significant testing issues. It just adds time to the process. [Statements submitted at EAC public hearing, June 30, 2005, New York]	Accepted	Merle King	
1737 6.8			NULL	On behalf of the Philippine American Service Group, Inc. (FASGI), We express the desirability that Section 6.8 should require a voter-verified paper audit trail for all voters and voting systems. It should be mandatory.	Accepted	Merle King	
1751 6.8			NULL	The WSG provisions regarding security of VPAT raises serious concerns about the applicability of HAVA accessibility requirements to VPAT and appear to be in direct conflict with the statutory requirements of HAVA regarding alternative language accessib	Accepted	Merle King	
1753 6.8	Jun-36		NULL	Although this section deals specifically with VPAT, HAVA is clear that the definition of voting system, to which the requirements attach, includes "the total combination of mechanical, electromechanical, or electronic equipment that is used to mai	Accepted	Merle King	
1928 6.8			NULL	VOTER VERIFIED PAPER RECORDS: The EAC to date has declined to require or even recommend a voter-verified paper record. The excuse: explicit language for VVPR was not part of the Help America Vote Act (although a strong argument can be made that it is impl	Accepted	Merle King	
1929 6.8			NULL	CLARIFICATION OF TERMS: The (currently "optional") VPAT guidelines fail to define the term "VPAT" sufficiently. Voter-verified paper ballots such as optical scan ballots, which can be voted with the assistance of ballot-marking devices or by the voter m	Accepted	Merle King	
287 6.8	36	8	NULL	Move this Section to Section 2 where it belongs and not under Security where it is out of place.	NULL	NULL	
1247 6.8			NULL	I want Section 6.8 to require a voter-verified paper audit trail for ALL voters and voting systems. It should be mandatory	Accepted	Merle King	
263 6.8.1	36	1	Volume I.doc	The "optional" part of 6.8 should be removed. Furthermore all efforts should be made to comment all modules regardless of size (number of lines) of the module. Also all of the recommendations should be used by all of the voting equipment vendors and should	Accepted	administrator	
1176 6.8.1.2			NULL	I want Section 6.8 to require a voter-verified paper audit trail for ALL voters and voting systems. It should be mandatory. Also, Appendix D addresses this to some degree. I want to ensure that the voter has a secure means of verifying that what they vo	Accepted	Merle King	

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1177	6.8.1.2			NULL	The paper audit trail should be made MANDATORY in ALL election jurisdictions, and should be the OFFICIAL LEGAL ballot. Without such a paper trail, or without making the paper trail the OFFICIAL LEGAL BALLOT in case of recount or dispute, there is NO WAY T	Accepted	Merle King	
360	6.8.1.3	37	8	NULL	Discussion As drafted, it can appear that this requirement is not consistent with the discussion that follows immediately below: "The electronic record cannot hide any information related to ballot choices; all information relating to ballot choices mu	Accepted	Carol Paquette	
1117	6.8.1.3	37	8	NULL	In the requirement, "The paper record shall contain all information stored in the electronic record", the discussion language below the requirement actually clarifies the requirement intent to have the paper record display all information 'relating to bal	Accepted	Merle King	
1859	6.8.1.3	37		NULL	Volume I Section 6 Page 37, Section 6.8.1.3 The discussion appears to contradict the requirement. It may be advisable to restate the requirement as "The paper record shall display all of the same ballot choices stored in the electronic record". Altern	Accepted	Merle King	
1238	6.8.2	38	14-25	NULL	This does not seem practical and could lead to distortions in the data being provided. A better approach would be to provide a magnifier.	Accepted	Merle King	
1169	6.8.2.1	38	3	NULL	6.8.2.1 All usability requirements from Volume I, Section 2.2.7 shall apply to voting stations with VVPAT. The voting station should not visually present a single race spread over two pages or two columns. If there is a ballot with a race N of M wher	Accepted	Merle King	
283	6.8.2.2	38	14	NULL	Change "should" to "shall". Font size must be an option for the voter for the elderly and those with sight impairments.	NULL	NULL	
274	6.8.2.2	38	15	NULL	Change "should" to "shall". The choice of font sizes must be required to allow all sighted voters to read the vvpat without having to request a magnifying glass.	Accepted	Carol Paquette	
281	6.8.2.2	38	14	NULL	Change "should" to "shall". This must be required for voters with sight disabilities and in keeping with full accessibility requirements.	Accepted	Carol Paquette	
289	6.8.2.2	38	14	NULL	Change "should" to "shall". Font size must be an option for the voter for the elderly and those with sight impairments	Accepted	Carol Paquette	
1029	6.8.2.2	38		NULL	After the words "3.0 mm," strike rest of sentence.	Accepted	Merle King	
1646	6.8.2.2	38	14	NULL	Ensure Equal Access to paper ballots. Revise 6.8.2.2 to read: "The voting station shall be capable of showing the information on the paper in at least two font ranges (a) 3–4 mm and (b) 6.3-9 mm."	Accepted	Merle King	

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1678	6.8.2.2			NULL	ACB recommends that the "should" regarding the display of information in at least two font ranges be changed to "shall." It is discriminatory that Section 2.2.7.1.2.2.6 offers full access to the VVPAT for individuals who are blind, yet the provision of the Volume I Section 6 Page 38-39 Section 6.8.2.3 and 6.8.2.3.1 The term "easy" is not a quantifiable term the VSTL can test for compliance. We believe these two sections can stand on their own without that one word.	Accepted	Merle King	
1860	6.8.2.3	38-39		NULL	Given that scrolling a video display was discouraged, it is equally inappropriate to use scrolling to view a hardcopy. Further, if the paper record spans several pages, it is not sufficient to have the last page marked as the end because a user seeing only	Accepted	Merle King	
1291	6.8.2.3.2	39	19-Sep	NULL	Volume I Section 6 Page 39 Section 6.8.2.3.3 It appears this requirement would only apply to records on separate pieces of paper, but would not apply on a scrolled record where the entire ballot fits on a contiguous scrolled piece of paper. On a scroll The VVSG appropriately provides that the disability requirements of 2.2.7 apply to VVPAT. However, the guidelines do not similarly require that the alternative language accessibility requirement of HAVA be met. In fact, the Commission guidelines appear to	Accepted	Merle King	
1861	6.8.2.3.3	39		NULL	In this requirement, a reference is made to an exception as set forth in Section 6.0.2.3.3.1.2, yet in searching the VVSG document, that section could not be found. Does this section reference contain a typo?	Accepted	Merle King	
1756	6.8.3	Jun-40		NULL	Volume I Section 6 Page 40, Section 6.8.3.1 We could not locate section 6.0.2.3.3.1.2 referenced in this requirement.	Accepted	Merle King	
1118	6.8.3.1	40	2	NULL	Change language to include "written" alternative language. This will allow "unwritten" languages to be verified through audio capability, but have the VVPAT printed in English.	Accepted	Merle King	
1863	6.8.3.1	40		NULL	As with printing any ballot (optical scan or audit trail) in an alternative language, the privacy of an ethnic group can be compromised. Although an individual voter's privacy can be maintained, how a particular ethnic group using an alternative language	Accepted	Merle King	
1036	6.8.3.2	40		NULL	Volume I Section 6, Page 40, Section 6.8.3.2 We could not locate section 6.0.2.5.1.3 referenced in the discussion of this requirement.	Accepted	Merle King	
1119	6.8.3.2	40	13	NULL		Accepted	Merle King	
1864	6.8.3.2	40		NULL		Accepted	Merle King	

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1865 6.8.3.2	40	NULL	Volume I Section 6, Page 40 Sections 6.8.3.2-6.8.3.4 While we have pointed out several areas in the standards that we think could benefit from revision, we think the proposed regulations have implemented the most usable guidelines possible for both vote	Accepted	Merle King	
284 6.8.3.5	41	5 NULL	Change "should" to "shall". HAVA requires that disabled voters have the same voting rights as those who are not disabled. The feed for the verification MUST come from the printer or printer feed and NOT the DRE.	NULL	NULL	
275 6.8.3.5	41	4 NULL	Change "should" to "shall". VVPAT systems presently being circulated do not allow blind voters to verify the vvpap. Audio feed must be taken from the printer or printer feed and not from just the DRE.	Accepted	Carol Paquette	
288 6.8.3.5	41	5 NULL	Change "should" to "shall". HAVA requires that disabled voters have the same voting rights as those who are not disabled. The feed for the verification MUST come from the printer or printer feed and NOT the DRE.	Accepted	Carol Paquette	
1120 6.8.3.5	41	4 NULL	For this requirement, there are many issues of feasibility and usability that require more thought and supporting research to identify how to address those concerns. It may be easy to state that an automated reader can be used to convert the text on the p	Accepted	Merle King	
1648 6.8.3.5	41	4 NULL	Ensure Equal Access to paper ballots. Revise 6.8.3.5 to be consistent with above.	Accepted	Merle King	
1758 6.8.3.5	Jun-41	NULL	This section states that "If the normal voting procedure includes VVPAT, the accessible voting station should provide features that enable voters who are blind to perform this verification."	Accepted	Merle King	
1866 6.8.3.5	41	NULL	Volume I Section 6, Page 41, Section 6.8.3.5 Current vvpap systems ensure that voters who are blind have the opportunity to verify their ballots through an audio read-back of all the selections they have made. These voters are protected in the same man	Accepted	Merle King	
1030 6.8.4	41-43	NULL	Delete language related to "spoiling" an electronic ballot.	Accepted	Merle King	
1868 6.8.4.1	41	NULL	Volume I Section 6, page 41, Section 6.8.4.1 The requirement is correct, however, the discussion contemplates the preservation of a spoiled electronic record. There is no logical reason to store a "spoiled" electronic record. One of the benefits of	Accepted	Merle King	

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285	6.8.4.3	42	1	NULL	Change "should" to "shall". The audit trail is to find problems that need to be fixed. If evidence of problems is not required to be saved then there will be no fix. This is required or 6.8.4.4 cannot happen.	NULL	NULL	
286	6.8.4.3	42	1	NULL	Change "should" to "shall". The audit trail is to find problems that need to be fixed. If evidence of problems is not required to be saved then there will be no fix. This is required or 6.8.4.4 cannot happen.	NULL	NULL	
276	6.8.4.3	42	1	NULL	Change "should" to "shall". There is no reason not to do this. The "Discussion" is correct except this should be a requirement.	Accepted	Carol Paquette	
365	6.8.4.3	42	1	NULL	Discussion This is not relevant for ballot marking systems where there could be ambiguity about what the "voting station" is. Our recommendation is: "DRE voting stations shall mark and preserve electronic and paper records that have been spoiled. System	Accepted	Carol Paquette	
1121	6.8.4.3	42	1	NULL	In this requirement, "The voting station should mark and preserve electronic and paper records that have been spoiled.", it is impractical for a DRE to preserve a spoiled electronic record. Electronic records are not stored (cast) until after the voter has	Accepted	Merle King	
1869	6.8.4.3	42		NULL	Volume I Section 6, page 42, Section 6.8.4.3 This requirement should not include preservation of spoiled electronic records, since, they do not currently exist. It does, however, make sense to clearly mark and retain all paper records that were voided	Accepted	Merle King	
1122	6.8.4.4	42	8	NULL	In this requirement, "Following the close of polls, a means shall be provided to reconcile the number of spoiled paper records with the number of occurrences of spoiled electronic records, and procedures shall be in place to address any discrepancies.", it	Accepted	Merle King	
1870	6.8.4.4	42		NULL	This section should be eliminated. The "spoiled ballot" is a function of paper voting where voters required a replacement ballot. In electronic voting, voters are permitted to correct their own ballots and do not require a replacement ballot. Consequently	Accepted	Merle King	
366	6.8.4.5	42	14	NULL	Discussion: Ballot marking systems do not have a maximum number of spoiled ballots, except, perhaps a maximum number established by manual intervention by poll workers. We suggest the following: "If there is a maximum number of spoiled ballots set by a	Accepted	Carol Paquette	

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1871 6.8.4.5		42		NULL	From a human factors standpoint, this is an important requirement to include. Voters need to know when they will be permitted to make changes and when it will be their last opportunity to do so. In the unlikely event that a voter's selections on their	Accepted	Merle King	
1873 6.8.4.6		42		NULL	This should be a "shall" rather than a "should" requirement.	Accepted	Merle King	
277 6.8.4.7		43		1 NULL	Change "should" to "shall". This must be required or electronic votes will be cast before paper votes are verified by the voter.	Accepted	Carol Paquette	
278 6.8.4.7		43		9 NULL	Change number to 6.8.4.8	Accepted	Carol Paquette	
279 6.8.4.7		43		9 NULL	Change number to 6.8.4.8	Accepted	Carol Paquette	
1874 6.8.4.7		43		NULL	We think this section might be more appropriately phrased as follows: "The voting system shall not record the electronic representation of the ballot until the paper record has been approved by the voter."	Accepted	Merle King	
1875 6.8.4.7		43		NULL	Volume I Section 6, Page 43, Section 6.8.4.7 (the second one) This section number is repeated and needs to be re-numbered as 6.8.4.8.	Accepted	Merle King	
1239 6.8.5		43	16-30	NULL	This guideline should not preclude reel to reel systems that provide better security and integrity than fewer points of failure that a system where the paper records are cut.	Accepted	Merle King	
1031 6.8.5.1	43-44			NULL	Add in the discussion statement that a reel-to-reel printer is acceptable and that voter privacy and anonymity concerns can be addressed via administrative requirements.	Accepted	Merle King	
1876 6.8.5.1.1		44		NULL	The EAC may want to consider amending this to include both the privacy and the independence mandates of HAVA accessibility requirements	Accepted	Merle King	
1877 6.8.5.2		44		NULL	Under the discussion section, there are several other security processes and procedures in place that achieve this goal, such as the use of tamper evident seals to secure the paper records in an enclosed unit at the polling place, legal restrictions on public discussion language in its entirety.	Accepted	Merle King	
1032 6.8.5.3		44		NULL	Delete discussion language in its entirety.	Accepted	Merle King	
1879 6.8.5.3		44		NULL	One of the benefits of DRE systems is that voters are not required to request a ballot in a particular language, they can simply choose from the available languages in the privacy of the voting booth. The discussion in this section needs to be eliminate	Accepted	Merle King	
1237 6.8.5.4				NULL	Vol. I, 6.8.5.4 "The voter shall not be able to leave the voting area with the paper record if the information on the paper record can directly reveal the voter's choices." - The voter should not receive a record that directly *</>or indirectly</>* re	NULL	NULL	

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					Vol. I, 6.8.5.4 "The voter shall not be able to leave the voting area with the paper record if the information on the paper record can directly reveal the voter's choices." - The voter should not receive a record that directly *or indirectly* reveals t	Accepted	Merle King	
1260	6.8.5.4			NULL	Why include the word "directly" in this requirement. Presumably, this would be problematic if the voter's choices are capable of being revealed either directly or indirectly	Accepted	Merle King	
1880	6.8.5.4	44		NULL	The term "easily memorable" by the voter is not testable.	Accepted	Merle King	
1881	6.8.5.5	44		NULL	[This comment is a proposed addition to Volume I, Appendix C.2 Best Practices for Security - relating to Section 6.8.6. Below is a recommendation suggesting that if voting equipment stores ballot images, such images should be made publicly available for i	Accepted	Merle King	
1310	6.8.6			NULL	[Comment 4 of 4] A random sample of the VVPAT records should be hand-interpreted and tested against the cast vote records during the election to verify the accuracy of the CVRs and the VVPAT, using live audit methodology. 6.8.6.12 A random sample	Accepted	Merle King	
1327	6.8.6			NULL	The term "highly precise" is not testable. We recommend incorporating the requirements listed in the "discussion" component of this section as sub-subsections of this requirement.	Accepted	Merle King	
1882	6.8.6.1	45		NULL	There is a contradiction between the following two requirements: "6.8.6.8.1 The paper record should contain error correcting codes for the purposes of detecting read errors and for preventing other markings on the paper record to be misinterpreted	Accepted	Merle King	
1123	6.8.6.10.3	50		10 NULL	A random sample of the VVPAT records should be hand-interpreted and tested against the cast vote records during the election to verify the accuracy of the CVRs and the VVPAT, using live audit methodology. 6.8.6.12 A random sample of the paper records	Accepted	Merle King	
2010	6.8.6.12			NULL	This requirement appears to be out of place in the Section 6.8 listing of requirements for voter verified paper audit trails.	Accepted	Merle King	
1883	6.8.6.2	45		NULL	In this requirement "The voting system should generate and store a digital signature for each electronic record.", it doesn't seem practical to store a digital signature for each electronic record, when a single digital signature for the whole record file	Accepted	Merle King	
1124	6.8.6.5	47		10 NULL		Accepted	Merle King	

Section Comments Sorted by Section Number

1884	6.8.6.6	47	NULL	Volume I Section 6, Page 47, Section 6.8.6.6 et seq. These items appear to be independent of the Section 6.8 listing of requirements for vvpap and might be better suited elsewhere in the VVSG.	Accepted	Merle King	
1886	6.8.7.1	50	NULL	This section is overly broad and appears to be better suited for sections pertaining to all voting systems, rather than its inclusion as a subcomponent of the VVAPT guidelines. Even if moved elsewhere, it would need to include enough detail to be a testab	Accepted	Merle King	
1126	6.8.7.2	51	1 NULL	In this requirement, "The voting station shall be physically secure from tampering, including intentional damage.", there is only so much protection that can be provided to a unit that is being subjected to intentional damage. If someone takes a sledge ha	Accepted	Merle King	
1240	6.8.7.2.1	51	12-Jun NULL	The guideline should be amplified to require this port to be sealed or otherwise secured during an election. This would limit a person from plugging into the system during an election as well as reduce the perception that the system could be "hacked."	Accepted	Merle King	
1127	6.8.7.2.5	52	2 NULL	In this requirement, "Printer access to replace consumables such as ink or paper shall only be possible if it does not compromise the sealed printer paper path.", there is a contradiction. How can a consumable such as paper be replaced without compromise	Accepted	Merle King	
1128	6.8.7.2.7	52	15 NULL	In this requirement, it is indicated that only physical security measures be present for evidence of tampering with the printer, however, there should also be logical detection that the printer connection has been compromised and an audit log entry made of	Accepted	Merle King	
1887	6.8.7.3	52	NULL	While worthy requirements, the terms "highly reliable" and "easily maintained" are not testable without further definition.	Accepted	Merle King	
1243	6.8.7.3.4	53	18-26 NULL	It would be better to seal the devices and remove and replace seals as paper and/or ink needs to be replaced. The Election Officers would document the maintenance to include the new seal numbers. This would seem a more secure approach and enhance perceptio	Accepted	Merle King	
1209	7		NULL	As a retired Quality Control Director of billion-dollar world wide corporations, I want to express my agreement with the opinion of Kathy Dopp, who wrote: ***** Appendix D regarding "Independent Dual Verification" contains logic errors	Accepted	Merle King	

Section Comments Sorted by Section Number

1354	7			NULL	The reliability of voting systems can impact election results as well as ballot availability and enfranchisement. The legacy low Mean Time Between Failures, that allows for nearly a 10% equipment malfunction rate during election day, has been deemed unacc	Accepted	Merle King	
1356	7	C-3		NULL	The reliability of voting systems can impact election results as well as ballot availability and enfranchisement. The legacy low Mean Time Between Failures, that allows for nearly a 10% equipment malfunction rate during election day, has been deemed unacc	Accepted	Merle King	
1139	7.2	(Vol 2)	7-1	NULL	Regarding this test in Vol 2, Section 7.2, if a vendor is already externally audited and certified for its quality assurance program, then that certification from the accredited external auditors should be sufficient to satisfy this test. If the a vendor responsible for...providing test reports for review by the test lab, and to the purchaser." Comment: These test reports should also be available for review by any political party, prospective purch	Accepted	Merle King	
1340	7.4		187	4-Jan	NULL	Accepted	Merle King	
1365	7.4		187	4-Jan	NULL	Accepted	Merle King	
1275	8			NULL	I want sect 8 to continue having paper ballots...	Accepted	Merle King	
964	8.7.1	5-Aug		13	NULL	Accepted	Merle King	