EAC Decision on Request for Interpretation 2015-02
(Certification Test Fixtures)

VVSG 1.1 Volume 2: 1.8.2.3 Certification Test Fixtures

Date:

July 23, 2015

Question:

Can VSTLs use machine marked ballots, printed by the manufacturer, for Certification testing?

Section of Guidelines:

VVSG 1.1 V2: 1.8.2.3

1.8.2.3 Certification Test Fixtures

The VSTL shall not use simulation devices or software that bypass portions of the voting system that would be exercised in an actual election, with the following exceptions:

a. The VSTL may bypass the user interface of an interactive device in the case of environmental tests that would require subjecting test "voters" to unsafe or unhealthy conditions, or that would be invalidated by the presence of a test "voter."
b. The VSTL may bypass the user interface of an interactive device in capacity tests to verify that the system and its constituent components are able to operate correctly at the maximum limits specified in the implementation statement; for example, maximum number of ballots that can be counted, maximum possible vote total (counter capacity), or maximum number of ballot styles.

The VSTL may use test fixtures or ancillary devices to facilitate testing as long as they closely and validly simulate actual election use of the system. If a tabulator is specified to count paper ballots that are manually marked with a specific writing utensil, it is not valid to substitute ballots that were mechanically marked by a printer. However, ballots that were marked according to manufacturer instructions can sometimes be recycled through a tabulator without invalidating the test.

Discussion:

EAC already requires VSTLs to use a percentage of hand marked ballots for accuracy tests and will continue to do so to make sure hand marked and machine marked are used in testing.

As long as a manufacturer identifies that the voting system can read both hand marked and machine marked ballots, using machine marked ballots in testing is acceptable. Manufacturers currently provide machine marked ballots to VSTLs for test campaigns.

Conclusion:

EAC agrees that machine marked ballots provided by the manufacturer qualify as ballots marked according to manufacturer instructions. The ballots meet this requirement as long as the manufacturer states that the voting system can read machine marked ballots in the system description or overview submitted to the EAC.

Applicability:

Immediate for all voting system applications submitted to VVSG 1.1.