Re: Reuse of prior testing conducted by SysTest Laboratories

Dear Ms. Audette,

This letter is in response to iBeta Quality Assurance’s recommendations (attached) to the Election Assistance Commission (EAC) regarding the reuse of certain portions of testing conducted by SysTest Laboratories as part of the testing campaign for the Premier Assure 1.2 voting system. EAC instructed (attached) iBeta, per section 2.10.6 of the EAC’s Testing and Certification Program Manual, to conduct a review and audit of certain portions of testing conducted by SysTest prior to SysTest’s suspension. This review and audit was conducted in an effort to preserve any prior testing that could be relied upon as meeting the EAC’s rigorous program requirements.

Based on iBeta’s recommendations the EAC approves the following reuse of prior testing:

PCA Document Review

iBeta’s letter to the EAC regarding reuse of the PCA document review states, “The iBeta recommendation based on the audit and review as documented herein is that the results of the SysTest PCA Document Review are adequate for reuse in the Premier Assure 1.2 certification test effort and there is not a need to conduct a full review of the TDP.” This recommendation came as a result of an audit of the Technical Data Package conducted by iBeta with the EAC’s approval.

After careful review of iBeta’s recommendation as well as the test report submitted by SysTest for the Premier Assure 1.2 voting system, the EAC approves iBeta’s recommendation for the reuse of the PCA document review conducted by SysTest.
**Environmental Hardware Testing**

iBeta’s letter to the EAC regarding the reuse of Environmental Hardware testing recommends the reuse of hardware environmental tests conducted by SysTest for all **but** the TSX Models A,C, and D and the OSX Ballot Box. iBeta also recommends, based on NOC 08-01, executing the Electrostatic Discharge (ESD) test on those components listed above.

After reviewing the iBeta recommendation and the Test Report submitted by SysTest the EAC authorizes the reuse of all environmental hardware testing EXCLUDING ESD testing to be conducted on the TSX Models A,C, and D and the OSX Ballot Box.

This approval is based, in part, on the independent professional judgment of iBeta that the testing to be reused would not have been impacted by the changes made to the Premier Assure 1.2 system since this hardware testing was conducted. In addition, the EAC approves the reuse of this testing with the understanding that all ESD testing will be noted in the test plan outlining what testing iBeta will be performing as part of the Premier Assure 1.2 test campaign. This process will allow the EAC to ensure proper documentation of the testing conducted by iBeta as part of this testing engagement.

The EAC recognizes that iBeta is currently in the process of conducting a 3% review of the Premier Assure 1.2 source code and will make a recommendation to the EAC regarding the reuse of the source code review. Also, iBeta is conducting an audit of the accuracy testing conducted by SysTest and will make a recommendation to the EAC regarding this testing. The EAC looks forward to receiving both these recommendations and making a determination on the reuse of both these tests.

If you should have any questions regarding this letter or the Premier Assure 1.2 testing engagement please do not hesitate to contact me. Thank you.

Sincerely,

Brian Hancock
Director, Testing and Certification
US Election Assistance Commission