

From: [E. John Sebes](mailto:E.John.Sebes)
To: votingsystemguidelines@eac.gov
Subject: OSDV comments on UOCAVA Pilot Program Testing Requirements
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Attachments: OSDV-comments-EAC-UOCAVA.pdf

OSDV is pleased to provide comments on the UOCAVA Pilot Program Testing Requirements, in the attached PDF document.
Sincerely,
John Sebes
OSDV Foundation

Open Source Digital Voting Foundation

PUBLIC COMMENT ON THE UNIFORMED AND OVERSEAS
CITIZENS ABSENTEE VOTING ACT PILOT PROGRAM
TESTING REQUIREMENTS

Submitted to The United States Election Assistance Commission

The Open Source Digital Voting (OSDV) Foundation is pleased to provide the Election Assistance Commission (EAC) with these comments on the draft UOCAVA Pilot Program Testing Requirements. Our comments were developed in consultation with the extensive of ACCURATE; our comments consist of (a) underlining a few of the ACCURATE comments that we feel are most important from our viewpoint; (b) the addition of a few suggestions for how pilots should be designed or conducted. Among the ACCURATE comments, we wish to underline:

- The need for a pilot's voting method to include a robust paper record, as well as complementary data, that can be used to audit the results of the pilot.
- Development of, and publication of security specifications that are testable.

In addition, we recommend:

- Development of a semi-formal threat model, and comparison of it to threats of one or more existing voting methods.
- Testing in a mock election, in which members of the public can gain understanding of the mechanisms of the pilot, and perform experimentation and testing (including security testing), without impacting an actual election.
- Auditing of the technical operations of the pilot (including datacenter operations), publication of audit results, and development of a means of cost accounting for the cost of operating the pilot.
- Publication of ballots data, cast vote records, and results of audit them, but without compromising the anonymity of the voter and the ballot.
- Post-facto reporting on means and limits of scaling the size of the pilot.