



**Voting System Testing & Certification Division**

U.S. Election Assistance Commission  
1201 New York Avenue, NW, Suite 300  
Washington, DC 20005

[www.eac.gov](http://www.eac.gov)

Sent Via Electronic Mail

June 27, 2011

Dear Registered Manufacturer,

Over the course of the last 12-18 months, the EAC has noticed what appears to be an increasing trend in which voting systems submitted to the EAC for conformance testing to the VVSG are clearly not ready to be tested by our VSTLs. Recent examples include very late delivery of hardware components to VSTLs and the submission of software packages containing numerous fundamental coding discrepancies. Submitting systems for testing before they are functionally ready to participate in conformity testing is a waste of time and money for all entities involved in this process. The EAC reminds manufacturers that VSTL testing should not be used to replace rigorous internal pre-production and beta testing by voting system manufacturers. In addition, please be reminded that Volume II, Section 1.6 of the VVSG states that:

*“The system submitted for testing **shall** meet the following requirements:*

- a. The hardware submitted for certification testing shall be equivalent, in form and function, to the actual production version of the hardware units or the COTS hardware specified for use in the TDP*
- b. The software submitted for certification testing shall be the exact software that will be used in production units*
- c. Engineering or developmental prototypes are not acceptable, unless the vendor can show that the equipment to be tested is equivalent to standard production units both in performance and construction”*

As of this date, the many of voting systems submitted to EAC VSTLs have failed to meet the requirements noted above. The EAC remains committed to implementing a certification program that will maximize the limited resources available in the election community while still providing a conformity assessment process that ultimately leads to better voting systems for election officials and voters. We trust that the manufacturing community agrees with this goal and will work to ensure that systems submitted for certification are truly ready to undergo conformity assessment by our VSTLs.

If you have any additional concerns or questions regarding the information contained in this letter or anything else concerning the EAC Testing and Certification Program, please do not hesitate to contact me by phone at 202-566-3100, or via email at [BHancock@eac.gov](mailto:BHancock@eac.gov)

Sincerely,

A handwritten signature in black ink, appearing to read "Brian J. Hancock". The signature is fluid and cursive, with the first name "Brian" and last name "Hancock" clearly legible.

Brian J. Hancock, Director  
Voting System Testing and Certification