

July 29, 2009

Brian Hancock  
Director of Voting System Testing & Certification  
U.S. Election Assistance Commission  
1225 New York Avenue, NW, Ste. 1100  
Washington, DC 20005

Dear Mr. Hancock,

This letter provides our response to your report dated June 18, 2009 regarding the on site assessment of SysTest Labs' policies, procedures and practices in accordance with Section 4.5.1 of the U.S. Election Assistance Commission (EAC) Voting System Test Laboratory Program Manual. SysTest Labs has responded to all five items in which the EAC provided recommendations to better meet EAC and ISO 17025 program requirements:

- (1) Checklist item 3.3 (c): The procedures(s) adopted shall ensure that: invalid or obsolete documents are promptly removed from all points of issue or use, or otherwise assured against unintended use. Currently, access to obsolete laboratory documents is not currently limited, potentially enabling staff to use out of date documents.

**Response** – SysTest Labs' SLP-QS-02 includes a process for moving obsolete documents to an Archive folder on the Quality System. The SLP notes that once the new QSM or SLP version has been approved, the current approved QSM or SLP version is moved to the Outdated folder and renamed accordingly. The new approved QSM or SLP version is moved into the appropriate Approved folder and renamed accordingly.

To better secure the Archive folder, rules regarding access to the Archive folder have been implemented and noted in SLP-QS-02 which limits the opportunity for mistakenly accessing outdated documents.

- (2) Checklist item 3.3 (d): The procedures(s) adopted shall ensure that: obsolete documents retained for either legal or knowledge preservation purposes are suitably marked. No specific marking on obsolete documents to indicate their outdated status. Electronic file name and folder locations currently distinguish obsolete documents from active documents.

**Response** – SysTest Labs' SLP-QS-02 has also been updated to include a process for adding "watermarks" to documents to better indicate their status.

- (3) Checklist item 3.4 (a): Management system documents generated by the laboratory shall be uniquely identified. Such identification shall include: the date of issue and /or revision identification. Current laboratory conflict of interest form has no date or other revision markings.

**Response** – The following documents are now version controlled with the revision number being tracked in the footer of the document. The most up to date version can always be found on SysTest Labs' Human Resource ADP portal.

- **Laboratory Independence Policy Acknowledgement Form**
- **Employee Proprietary Information and Non Solicitation Agreement**
- **Financial Disclosure Agreement Form**

- (4) Checklist item 3.5.2: (Document Changes) Where practicable, the altered or new text shall be identified in the document or the appropriate attachments. New text of revised documents is generally unmarked, but change notes are made in a configuration tracking log indicating the primary purpose of the change.

**Response** – SysTest Labs' SLP-QS-02 now includes a process for tracking changes to make modifications more easily identified. The SLP notes that the QSM and all SLPs will include highlights of changes from the most recent to the current version and contains instructions on how to do this.

- (5) Checklist item 8.5.1 (a): Validation is the confirmation by examination and the provision of objective evidence that the particular requirements for a specific intended use are fulfilled. The laboratory shall validate non-standard methods used outside their intended scope, and applications and modifications of standard methods to confirm that the methods are fit for the intended use. The application or field of application. SysTest SLP VC 29 currently indicates that the EAC approves validated test methods. These multiple incorrect references should be removed.

**Response** – SysTest Labs' SLP-VC-29 has been updated and no longer includes references to the EAC approving validated test methods.

We have included SLPs QS-02 and VC-29 with this response for your information.

SysTest Labs appreciates the EAC's observations and we look forward to continuing our work with you in the future. Should you have questions or like to discuss any of these items further, please let me know.

Yours Sincerely,



Mark Phillips  
Vice President, Compliance Services  
SysTest Labs