



**EAC Decision on Request for Interpretation 2008-09
(Safety Testing)
2002 VSS Vol. I, Section, 3.4.8
2005 VVSG Vol. I, Section 4.3.8**

Date:

August 25, 2008

Question:

How should voting systems be tested to ensure that they meet the safety standards required in both the 2002 VSS and the 2005 VVSG?

Section of Standards or Guidelines:

2002 VSS Vol. I, Section 3.4.8, Safety

2005 VVSG Vol. I Section 4.3.8, Safety

Background:

Several voting system manufacturers have requested guidance on how to best meet the requirements related to safety testing which state:

2002 VSS Vol. I, Section 3.4.8, Safety , 2005 VVSG Vol. I Section 4.3.8, Safety

“All voting systems shall meet the following requirements for safety:

- a. All voting systems and their components shall be designed to eliminate hazards to personnel or to the equipment itself*
- b. Defects in design and construction that can result in personal injury or equipment damage must be detected and corrected before voting systems and components are placed into service*
- c. Equipment design for personnel safety shall be equal to or better than the appropriate requirements of the Occupational Safety and Health Act, Code of Federal Regulations, Title 29, Part 1910.”*

Conclusion:

In order to meet the safety requirements of the 2002 VSS and 2005 VVSG, voting system manufacturers shall submit their systems for review to a Nationally Recognized Testing Laboratory (NRTL.) NRTL laboratories are specifically accredited by OSHA to identify relevant safety standards for a product and to conduct testing that ensures specific products meet the requirements of the product safety standards identified. Although neither the 2002 VSS nor the 2005 VVSG require that a voting system carry a Product Safety Listing (Label), voting system manufacturers may voluntarily choose to

implement such labeling in order to meet such requirements implemented by State or local election jurisdictions.

EAC accredited VSTLs remain responsible for non-core testing performed by third party laboratories as noted in Section 2.10.4.3 of the *EAC Voting System Test Laboratory Program Manual, Version 1.0*

Below is the current list of NRTLs:

[Canadian Standards Association \(CSA\)](#)

(also known as CSA International)

[Communication Certification Laboratory, Inc. \(CCL\)](#)

[Curtis-Straus LLC \(CSL\)](#)

[FM Approvals LLC \(FM\)](#)

(formerly Factory Mutual Research Corporation)

[Intertek Testing Services NA, Inc. \(ITSNA\)](#)

(formerly ETL)

[MET Laboratories, Inc. \(MET\)](#)

[NSF International \(NSF\)](#)

[National Technical Systems, Inc. \(NTS\)](#)

[SGS U.S. Testing Company, Inc. \(SGSUS\)](#)

(formerly UST-CA)

[Southwest Research Institute \(SWRI\)](#)

[TUV America, Inc. \(TUVAM\)](#)

[TUV Product Services GmbH \(TUVPSG\)](#)

[TUV Rheinland of North America, Inc. \(TUV\)](#)

[Underwriters Laboratories Inc. \(UL\)](#)

[Wyle Laboratories, Inc. \(WL\)](#)

Effective Date:

Immediate- for all voting systems test plan submitted after the date of publication.