March 4, 2008

GENERAL NOTICE TO EAC ACCREDITED VSTLs

After reviewing the first months of operation of our testing and certification program, the EAC is looking for ways to assure a timelier and more accurate review of work products received from the VSTLs. In order to allow EAC staff and technical reviewers to more efficiently and thoroughly provide responses to both draft Test Plans and Test Reports, the EAC is asking all VSTLs to forward their complete test methods to the Director of Certification by March 12, 2008. Failure to provide the test methods will likely result in prolonging the Test Plan/Test Report review process during a time when election officials are eagerly awaiting EAC certification of products to be deployed.

To clarify terminology and what information we are seeking, we note that “test method” is a broad term with several component parts. For each requirement of the VSS or VVSG, the VSTL is required to provide test methods. Often general test methods are provided in national and international standards. General test methods must be implemented through more detailed functional specific test procedures. These test procedures provide more specificity on how the test will be performed and applied to a specific voting system and what will be used as the exact pass/fail criteria. The Test Plan is the vehicle describing the exact application of the test procedure and how the pass/fail criteria are applied to the specific voting system. Test cases define what the system will be asked to perform. Multiple test cases are required to fully explore the functionality of a voting system. These test cases might, for example, include a Primary, General and Special election.

The Test Plan should reference the test methods to be used, including the function specific test procedures and test cases. The 2005 VVSG requires step-by-step procedures to be provided for each test case to be conducted (VVSG Volume 2 A.6.4).

In addition to the VVSG requirement noted above, NIST Handbook 150-22: Voting System Testing, states in Section 5.4.2 that:

“For each test in the Test Plan, the laboratory shall document all aspects of the test including the test method,(emphasis added). The level of detail shall be such that the laboratory can repeat the test or another laboratory can reproduce the test and the results of the test will be equivalent to the original test. Where the laboratory has developed test methods the meet the requirements of the VSS 2002
(or, presumably, VVSG 2005), validation of the test methods shall be included in the documentation.”

I am confident that submission of your test methods will serve to educate ourselves and our technical review teams so that we can more rapidly respond to laboratory work products to the benefit of yourselves, to voting system manufacturers, and ultimately, to election officials and to the voters of the United States.

If you have any questions or need to discuss this matter further, please do not hesitate to contact me.

Sincerely,

[Signature]

Brian J. Hancock
Director, Voting System Testing and Certification