

Proposed VVSG Vol. I and II, Version 1.1 comments

Proposed VVSG Vol. I, Version 1.1 comments

| Section | Title | Comment |
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| 2.3.1.3 | | This requirement could be applies to all types of systems. I think this requirement is out of place in the DRE section. |
| 3 and App. B | Usability and Accessible Requirements and B.2 Other Documents Used in Developing the Guidelines | Need more guidance on this from both the aspect of the manufacturer and the VSTL. |
| 3.2.1 a. | General Usability | This has 3 'must' requirements and maybe should be broken out as a. b. c. |
| 3.2.4 | Cognitive Issues | (1) C. calls for plain language. This is not testable. (2) C. iii. Familiar, common words are not testable. (3) d. Consistent with what election law is not testable. Who's law? (4) e. High level of clarity and comprehensibility are not testable. |
| 3.2.5 | Perceptual Issues | Has research been done on the complexity of these tests versus gain as they are stated? Are test standards and suites available for these tests. As some are new requirements this will require new tests and procedures to be developed by the VSTLs. |
| 3.2.8.1 | Operation | (1) 'Reasonably easy', 'certain amount of complexity', 'and 'reasonable amount of training' are all relative terms. How does the review evaluate the functions and documentation to determine if they are adequate? (2) NISTIR 7519 is referenced for information on how to implement the requirements of the VVSG section. Which sections of this document are expected to be included? If the requirements of this document are to be included, suggest adding a template so that manufacturers and VSTLs may ensure adequate compliance. |
| 3.2.8.2 | Safety | Safety section should be in chapter 4 |
| 4.1.5.1 | Ballot Handling | Is this computed through all tests? Should Multiple feeds be in a separate test as this can be lost data, when jams and rejections usually are correctable. |
| 4.3.3 | Reliability | Misfeeds are covered elsewhere, under the same section as jams. So are jams not a reliability problem? |
| 5 | Software Requirements | EAC is on the correct path to ensure the most reliable and accurate code, but the manpower cost to complete all this analysis will be extreme. |
| 5.2.4 | Software Modularity and Programming | Comment "If the coding standard specifies a coding style...make header comments redundant, then they can be omitted." This requirement includes the probability that headers will be eliminated by simply stating they are redundant. |

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| Appendix A | Glossary | Technical Data Package: since the requirements have been revised to include two types of TDP, the definition should be revised. |
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Proposed VVSG Vol. II, Version 1.1 comments

| Section | Title | Comment |
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| Volume II | | Although Section 2 has been designated for TDP review, many TDP requirements are included throughout various sections of both Volumes I and II of the TDP. Not all situations make this clear. In all cases, it should be clearly stated when information is to be included in the TDP. |
| 1.8.2.6 | Certification Test Practices | "...simple nonconformities in which the behavior of the system under test just does not meet the requirements." Question: What constitutes a simple requirement that "just does not meet the requirements"? |
| 1.8.2.6 d. | Certification Test Practices | What constitutes a logic defect that does not affect recording, tabulation, or reporting of a vote? |
| 1.8.2.6 e. | Certification Test Practices | States if corrective action to restore the equipment to fully operational occurs within eight work hours... Question: is the eight work hours intended to be consecutive, or total? |
| 2.1.1.1 | Required Content for Certification | This section discusses the Technical Data Package, main part and the Voting equipment user documentation; however, throughout the VVSG, it is not always clear in which part/parts the documentation is to be discussed. |
| 2.1.3 a.i. | Protection of Proprietary Information | (1) What applicable law will be accepted--federal, state, other? (2) If the information has been copyrighted, is that sufficient, or must the copyright law be cited also? |
| App. A National Certification Test Plan | A.2 Required Content of Test Plan, Proprietary Data, a. Submitting a Notice of Protected Information | (1) What applicable law will be accepted--federal, state, other? (2) If the information has been copyrighted, is that sufficient, or must the copyright law be cited also? |
| 2.2.2 e. | System Performance | Please add more details on what is expected to be documented. |
| 2.6.1 | Access Control | Please clarify: is the identical information listed to be provided in both the upper level and user level TDP? |
| 2.6.3 | Software Installation and Security | This section discusses the information which is to be included in the TDP but does not state whether the identical information is to be included in both the high-level and the user TDP, or if not, which is to be included in the user TDP. |

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| 2.6.4 | System Event Logging | (1) Please clarify: to be included in both the high-level and user TDPs? (2) Please explain: what is the difference between the TDP documentation in the first paragraph and the technical data package in the second paragraph? |
| 2.6.5 | Physical Security | (1) Please clarify: to be included in both the high-level and user TDPs? (2) Please explain: what is the difference between the TDP documentation in the first paragraph and the technical data package in the second paragraph? |
| 2.6.6 | Setup Inspection | Is any of this information intended to be included in the user TDP, or only the high-level TDP? |