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February 19, 2019

Brain J. Hancock
Director of Voting System Testing & Certification
U.S. Election Assistance Commission
1335 East West Highway, Ste. 4300
Silver Spring, MD 20910

Re: ES&S ECO 982 ExpressVote XL Hardware Changes

Dear Mr. Hancock,

ES&S has requested that SLI review ECO 982 including supporting documentation, to determine if the changes can be considered De Minimis with no additional testing required.

Summary Description:

ES&S has proposed adding the following to the ExpressVote XL:

- "Assembled in USA" labeling to identify final assembly point of the unit.
- Add AC power cord wrap hooks to the side of the cart for cable management when not in use.
- Introduce ballot bin plate for use when in BMD mode.
- Add brackets to PPM shelf and foot tabs for support to adjacent unit when in back to back storage.
- Replace wheel channel bolts to increase wheel channel to cart strength.
- Bolt on foot tab brackets for additional support of foot brackets.

Reference Documents:

- EAC 2005 Voluntary Voting System Guidelines (VVSG) Volume II, Sec. 1 & 4.
- EAC's Voting System Testing and Certification Program Manual V. 2, Sec. 3.4 & 3.5.
- NOC 12-01 COTS Computer Equivalency for de minimis Change.

Documentation used in SLI's Assessment:

- ECO-982 Signed.pdf
- BMD Blank - ECO-982.jpg
- Foot Bracket - ECO-982.jpg
- PPM Brackets - ECO 982.jpg
- XL Cart - New Cord Wrap Location - ECO-982.jpg

Conclusion:

SLI has assessed the hardware changes in ECO 982, including supporting documentation. The requested changes do not affect the system's reliability, functionality, capability, operation or software. SLI considers the nature of this change to be De Minimis and therefore not to affect the Federal certification status. ES&S's internal testing is adequate, and no additional testing is required.

As required under section 3.4.3 of the EAC's Voting System Testing and Certification Program Manual Version 2.0, ES&S has provided the necessary information to verify the ECO 982 change is De Minimis.

If you have questions regarding this assessment, please contact Jon Panek.

Sincerely,

A handwritten signature in blue ink, appearing to read "Traci Mapps".

Traci Mapps
Director of Operations