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slicompliance.com *SLI Compliance, a Division of GLI®*

March 23, 2020

U.S. Election Assistance Commission
1335 East West Highway, Ste. 4300
Silver Spring, MD 20910

Re: ECO 01390 Verity Relay COTS Modem Revision – MTD MNA1-2.0

Dear Mr. Lovato

At the request of Hart InterCivic, SLI is providing an assessment of ECO-01390, including supporting documentation provided by Hart InterCivic, to determine if this change is De Minimis, and no additional testing is required.

Summary Description:

The COTS 4G “Cellular Dongle” USB modem used in the Verity relay kit has been revised by the manufacturer, MultiTech. The metal shielding on the USB cable is now grounded (soldered) to the circuit board inside the modem enclosure to improve EMC performance. There are no changes to electronic components or drivers. The model number, MTD-MNA1, is being updated to add a “manufacturing flag” (suffix) of “-02”. MultiTech has also removed a passive clamp-on ferrite from the cable that was not needed with the properly grounded cable shield. This is a COTS revision only.

Reference Documents:

- EAC 2005 Voluntary Voting System Guidelines (VVSG) Volume II, Sec. 1 & 4
- EAC 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-01390 Summary -Verity Relay COTS Modem Revision 4005663 A00
- Approval Manufacturer’s List: 1005248 Rev B AVL.pdf
- Datasheets: MultiTech QuickCarrier Series Datasheet (MTD-MNA1) / (MTD-MNA1-2.0).pdf
- EMC Test Data: MTD-MNA1-2.0 EMC Test Data.pdf
- Verity Scan with Relay MTD-MNA1-2.0 Modem Test Report 4005666 A00

Conclusion:

Hart's ECO-01390 revised MTD-MNA1-2.0 modem has the identical regulatory compliance certification, FCC Class B, safety certification UL 60950-1, and environmental operating conditions as its predecessor the MTD-MNA1. No change to the Verity devices, neither hardware nor software, is required to support the revised modem.

SLI has assessed the hardware change in ECO 01390, including supporting documentation. The requested change does 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 Verity Voting 2.2, 2.2.1, 2.2.2, and 2.4 Federal certification status. Hart's QA regression testing was based on the evaluation and risk analysis of the modification to the modem on supported Verity systems. The testing that has been performed, including EMC 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, Hart InterCivic has provided the necessary information to verify the ECO 01390 change is De Minimis.

If you have questions regarding this assessment, please contact Darrick Forester.

Sincerely,

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

Traci Mapps
Director