

1. What do you think will be the dominant business model for voting system vendors in the coming decade? Will vendors be technology innovators or service providers? Both or neither?

The dominant business model will continue to be one defined by the clients under applicable legislation. In general, the requirements and services provided are explicitly defined by the client, with the vendors asked to respond to each client's needs.

Currently, the vendors are both innovators (innovating in both service and technology spheres) and service providers.

2. Is the proposed Innovation Class section of the 2007 VVSG Draft a viable approach to certification testing? As written, how would it impact your firm's strategy for developing and marketing systems?

The Innovation Class seems to be an appropriate approach. Our firm's approach has been to review standards, legislation, and requirements and to develop products appropriately. Therefore, as written, the Innovation Class would not have an adverse effect on our strategy for developing and marketing systems – it would simply be the rules followed.

3. What is the value of the open-ended vulnerability testing model? What are the risks? Do you conduct a form of this testing as part of your development process?

Open ended vulnerability testing is an important part of the design process, used at every stage of development, testing, and implementation. Further, external bodies have been contracted to perform independent testing.

The value of open ended testing comes from investigators with different backgrounds and experience proposing and evaluating vulnerabilities. In some cases, the vulnerabilities may be real, leading to a system or process change, or only apparent because they are protected by alternate processes or mechanisms. In either case, the investigative process is where the value lies as known disruptive techniques will be found using the systematic functional, reliability, and security testing included in the standards tests.

4. How could the processes of the VVSG be modified to incorporate minor revisions without incurring the costs (time and money) of a total system test, and still maintain the integrity of the standard?

We are not in a position to properly answer this question at this time.

5. Does the current draft of the VVSG create functional standards which permit vendors appropriate design freedom to innovate and implement, or is it a design standards that specifies how to build and implement voting, limiting design options?

Our belief is that the current draft successfully creates functional standards providing appropriate freedom to innovate and implement. The new standards are much more

specific and well-defined than the VVSG 2005. Our position is that the standards do not define specific design concepts or restrictions, but concentrate on design requirements. Important innovation for improved voter experience, usability, and reliability can all be undertaken within the framework of the standards.

6. Are there any changes to the VVSG, in either scope or depth, which would significantly reduce the cost (time and/or expense) of compliance without adversely affecting the integrity of the VVSG or the systems that are derived from its implementation?

We are not in a position to properly answer this question at this time..

7. How would the proposed VVSG impact the time-to-market of a new voting system? Can you identify specific requirements and associated processes within the standard that would significantly impede timely development and deployment of a voting system? What recommendations would you suggest for modifying the standard to address these impediments?

We believe that the proposed VVSG has more design requirements than previous versions, so increased time-to-market should be expected. One important consideration when addressing time to market is the effect of delays caused by ambiguity of the standards. Requests for clarifications will certainly arise, so we feel it is important to have an efficient process in place where all requests made of the EAC are dealt with promptly.