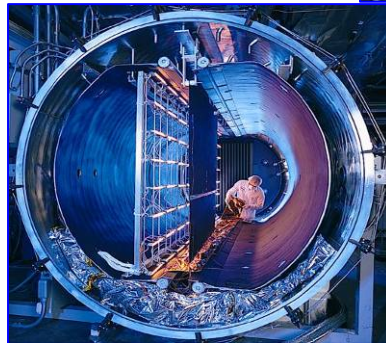


**Wyle Laboratories, Inc.
Written Statement for EAC Public Meeting and Hearing
October 26, 2006**

**Submitted to:
US Election Assistance Commission
1225 New York Ave., NW, Suite 1100
Washington, DC 20005**



Wyle Laboratories, Inc.

7800 Highway 20 West
Huntsville, AL 35806
(256) 837-4411; Fax (256) 721-0144
www.wylelabs.com



1. Introduction

Wyle Laboratories was founded 57 years ago as the first independent testing laboratory for systems and components under harsh environments, including dynamic and climatic extremes. This includes simulating vibrations experienced in aircraft, railroad cars, and other vehicles; seismic (earthquake) tremors; and an array of climate conditions such as temperature, humidity, and airborne salt, sand, and dust.

As critical civil, military and space programs progressed during the 1940s and 1950s, the demand for simulations in a laboratory setting increased. Today, Wyle is the world's leading environmental simulation laboratory, with nearly 3,000 employees. We are engaged in test and evaluation activities across the U.S. Products tested by Wyle include fuel valves for the Space Shuttle, most major aircraft components, and many consumer products.

Wyle provides testing services to the aircraft, military, space, communications, transportation and power industries. We maintain expertise in critical technical areas to ensure that we can always provide realistic simulation of the environment in which a product will function, and that we can take accurate and objective measurements of how the product operates in the specified environment.

2. Wyle's Involvement with Voting Systems

Wyle Laboratories became involved with the testing of electronic voting systems in the early 1990's. Wyle was the first company to obtain accreditation by the National Association of State Election Directors (NASED). Wyle does not "certify" or "approve" the voting system for use. Our work is simply to test the product in accordance with the required standards and to document these results. We do not control the listing number for the product and are not the final authority on the acceptability of the system. Our accreditation as an Independent Testing Authority (ITA) by NASED and the Election Assistance Commission (EAC) is limited to hardware and functional testing of voting machines. Wyle does not perform software, code review or system integration testing on voting machine systems.

Since the Early 1990's, Wyle has tested over 150 separate voting systems.



3. Client Relationships

Wyle has a varied customer base. We provide testing services for the original manufacturers of various components to ensure that the items meet the requirements that their customers demand; or, our client might be the buyer of a product who wants to ensure that his specifications have been met by the manufacturer; or, our client might be one of many government agencies that exist to ensure compliance with regulations at all levels.

Although most tests are performed in response to some type of regulation, there are many tests that are performed solely to support the manufacturer's reliability improvement goals or to significantly reduce the risk of product failures and associated costs.

Wyle often participates in the development of testing specification or standards with government agencies or industry committees. Wyle is not in the business of developing test requirements for its customers. Our function is to test, analyze, and report the factual results of our testing as a trusted agent to our clients. Wyle takes great pride in the fact that its reports are universally accepted as sound, factual, reliable, and unbiased.

Wyle makes it a priority to avoid Conflict of Interest in its activities. We have no business or financial interest in any product that we test. Wyle employees are required to meet strict Ethics and Conflict of Interest rules as a condition of their employment.



4. Confidentiality of Services

Wyle is bound by policy and ethics to respect the privacy of our clients. We view the relationship between an independent testing laboratory and its clients as similar to that between lawyer and client or between doctor and patient.

As a matter of policy, Wyle does not discuss any client by name, nor will we release any test information or data without written consent from the client. Simply stated, test data belong to the client and are not ours to share with third parties. This is standard practice for all the independent testing laboratories in the United States, which provide a critical infrastructure for our health care system, manufacturing sector, and the economy in general.

It is not uncommon, however, for test results from an independent source to be available to the ultimate buyer of a product. For example, in nearly all cases of environmental qualification testing for military equipment, the end customer requires evidence of qualification in the form of a report, which the equipment developer must provide along with their product.

5. Relationship with the EAC

In the case of voting machines, Wyle is an Independent Testing Authority (ITA) operating under the auspices of the Election Assistance Commission (EAC), which sets the testing standards and requirements under which Wyle operates. Wyle's role is to provide testing and evaluation services as set forth in the current voting system standards. Wyle is committed to work with the EAC, within the established guidelines, in order to help improve the process used to accredit voting systems.



6. Wyle comments

Wyle will provide a detailed written input by October 31 in accordance with the EAC request for comments. However, there are a few comments we would like to provide here.

Section 3.5.3.3 states that a signed statement from a VSTL that there is insufficient time to perform necessary testing and complete the certification process. There are many factors that can affect this timeframe, and the EAC should assure that testing could not be completed at any VSTL in sufficient time prior to waiving testing requirements.

Section 4.3 it states that: The initial application package will contain a copy of the Technical Data Package (TDP) for the system submitted to the testing and certification. This package is normally reviewed by the ITA as the first phase of the testing process. The ITA works with the vendor to ensure that all the required documents are included within the TDP. Is the EAC going to review this document now and what is the anticipated timeframe for completion?

Section 5.13 states that all test reports will be posted to the EAC Web site. Almost all the current voting system test reports contain proprietary information on the systems configuration and operations. Independent Test Labs normally do not release test report data to any other source but the client and who they direct us to release them to. This posting to the EAC web site may allow the vendors proprietary information to be accessed by virtually anyone.

After completing a thorough review of the Draft Procedural Manual for Voting System Testing and Certification Program, Wyle will be providing its final formal comments to the EAC by October 31, 2006.

7. Conclusion

Wyle Laboratories and its management and employees work diligently to provide a vital service to government and industry by providing the best possible range and quality of



testing services, including protection of the rights to data that belong to our clients. Wyle also understands the importance of voting machines to our election process, which must always operate with complete transparency to foster confidence in the results.