

Date	From	Comments
5/23/2019 6:15	Dessertshore@gmail.com	We need a ban on wireless modems and Internet connectivity in federally certified voting systems. connectivity to the public Internet through modems or other means compromises I love the VVSG 2.0!!
5/25/2019 12:22	pat.r.leahy@gmail.com	I am appalled that 20 states do not require federal certification/verification of their voting systems. In my opinion all systems should have a paper audit trail. The US is big on talk about democracy but can't verify the accuracy of I advise no connections to the internet, by any methods, for election Voting and Tallying equipment. The only possible exception to this would be for the poll books to ensure that each voter has but one vote. All modems must be removed from Voting and Tallying Equipment. Because of the cyber security issues,
5/25/2019 13:24	williams.wm.sk@gmail.com	Handmarked Paper Ballots should be the
5/26/2019 9:08	annecnettles@gmail.com	The guidelines should discourage or prohibit any device from connection to a modem and or the internet. The guidelines should strongly
5/26/2019 9:22	Blair.haney@outlook.com	encourage using hand-marked paper ballots for all votes: absentee, mail-in, at polling location,
5/26/2019 9:26	kristin6028@yahoo.com	Please ensure that all voting systems are unconnected to the Internet and rely upon hand-
5/26/2019 9:49	pamelahoward9@gmail.com	marked paper ballots without barcodes. Our democracy cannot afford further interference in our elections by bad actors.
		Paper ballots for ELECTION SECURITY!!

5/27/2019 14:37 gtimriley@gmail.com

Digital systems are inherently NOT secure and they are made even less secure if they are connected to any network. Because digital collection of votes is desirable for other reasons, I urge you to ensure election integrity and validation using voter verified paper records as a requirement for all digital balloting systems. Printing the voter's selections on a receipt like roll, scrolled into view under glass so it can be inspected for accuracy by the voter prior to casting the ballot ensures that voter's selections have been logged accurately in the event that the digital count must be verified, spot checked, and validated as true and correct. Elections are the heart of our constitutional republic and their integrity is worth the highest standards we can impose on election system vendors. Voter verified PAPER ballots are the only way that I support the draft Voluntary Voting System Guidelines (VVSG) and robust principles and guidelines for software security, integrity, auditability and ballot secrecy, and request the addition of an update to further protect against cyber intrusions. The FBI and Department of Homeland Security have confirmed that adversaries have targeted our election systems with cyber-attacks, it is imperative that the VVSG prohibit any connectivity to the Internet through wireless modems or other means. As The EAC writes its guidelines for voting machine security, every measure of security must be taken into account. I strongly urge the Commission to add the following to the guideline under Principle 13: DATA PROTECTION: "The voting system does not use wireless technology or connect to any public telecommunications infrastructure." Indeed, eliminating wireless modems and internet connectivity will not guarantee our voting machines can't be manipulated or hacked through corrupted USB sticks, insider attacks or supply chain corruption. That is why ultimately all votes should be cast on paper ballots and all elections should be audited by manually counting paper ballots, but this guideline is essential while we still use voting

5/27/2019 16:16 lyngarfiel@aol.com

Commission 1335 East-West Highway, Suite
4300 Silver Spring, MD 20910 RE: Public
Comments on Voluntary Voting System
Guidelines (VVSG) 2.0 Principles and Guidelines
Dear Members of the Commission: The Alabama
Disabilities Advocacy Program (ADAP)
appreciates the opportunity to comment on the
draft Voluntary Voting System Guidelines 2.0.
Principles and Guidelines. ADAP is the federally-
funded Protection and Advocacy (P&A) system
for individuals with disabilities for the state of
Alabama. P&As were established by the United
States Congress to protect the rights of people
with disabilities and their families through legal
support, advocacy, referral, and education. P&As
are in all 50 states, the District of Columbia,
Puerto Rico, and the U.S. Territories (American
Samoa, Guam, Northern Mariana Islands, and
the US Virgin Islands), and there is a P&A
affiliated with the Native American Consortium
which includes the Hopi, Navaho and San Juan
Southern Paiute Nations in the Four Corners
region of the Southwest. Collectively, the P&A
Network is the largest provider of legally based
advocacy services to people with disabilities in
the United States. Through the Protection and
Advocacy for Voter Access (PAVA) program,
created by the Help America Vote Act, the P&As

5/28/2019 9:12 jtucker@adap.ua.edu

U.S. Election Assistance Commission 1335 East-West Highway, Suite 4300 Silver Spring, MD 20910 Public Comments on Voluntary Voting System Guidelines (VVSG) 2.0 Principles and Guidelines The National Disability Rights Network (NDRN) appreciates the opportunity to comment on the draft Voluntary Voting System Guidelines 2.0. Principles and Guidelines. NDRN is the non-profit membership organization for the federally mandated Protection and Advocacy (P&A) agencies for individuals with disabilities. The P&As were established by the United States Congress to protect the rights of people with disabilities and their families through legal support, advocacy, referral, and education. P&As are in all 50 states, the District of Columbia, Puerto Rico, and the U.S. Territories (American Samoa, Guam, Northern Mariana Islands, and the US Virgin Islands), and there is a P&A affiliated with the Native American Consortium which includes the Hopi, Navaho and San Juan Southern Paiute Nations in the Four Corners region of the Southwest. Collectively, the P&A Network is the largest provider of legally based advocacy services to people with disabilities in the United States. Through the Protection and Advocacy for Voter Access (PAVA) program, created by the Help America Vote Act, the P&As

5/28/2019 10:34 michelle.bishop@ndrn.org

the draft Voluntary Voting System Guidelines 2.0 Principles and Guidelines. Disability Rights Pennsylvania is the designated Protection and Advocacy system in Pennsylvania. DRP was established by the U.S. Congress to protect and advocate for the rights of people with disabilities to be free from abuse, neglect, discrimination, and segregation. Through the Protection and Advocacy for Voter Access Program (PAVA), created by HAVA, DRP has a federal mandate to "ensure the full participation in the electoral process for individuals with disabilities, including registering to vote, casting a vote and accessing polling places" and are a leading voice on access to the vote for people with disabilities in Pennsylvania. Voting access will be an issue beyond the 2020 election. DRP is concerned that the only voting systems capable of meeting VVSG 2.0's requirements will be reliant on a marked paper ballot as the ballot of record. It is important to acknowledge that the promise of fully accessible, paper-based voting systems is as old as the passage of HAVA itself. Yet, the reality that paper ballots will be made accessible, private and able to be cast independently, for people with disabilities is not now, and may never be, a reality. DRP is also concerned with the adherence to the concept of "one accessible

5/28/2019 10:56 pradecic@disabilityrightspa.org

Guidelines (VVSG) 2.0 Principles and Guidelines Disability Rights Mississippi (DRMS) is the protection and advocacy system for the state of Mississippi. We are part of the National Disability Rights Network. While DRMS is thrilled to find that the US Election Assistance Commission (EAC) is attempting the complex task of balancing election security with federal elections accessibility requirements under law, we are concerned that the only voting systems capable of meeting VVSG 2.0's requirements will be reliant on a marked paper ballot as the ballot of record. Paper based voting systems are outdated. The hope that paper ballots will be made accessible, private and able to be cast independently for people with disabilities is not a reality. Widespread implementation of market-ready, fully accessible paper ballot voting systems is simply not achievable within the foreseeable future especially in Mississippi. Increasingly, voters with disabilities and their non-disabled peers are leveraging opportunities to vote by mail, vote absentee, and may be receiving their ballots electronically. Yet, VVSG 2.0 denies these voters the guarantee of an accessible ballot by limiting the extent of the VVSG's reach into non-traditional voting systems. DRMS believes that the failure of VVSG EAC Commissioners, I strongly support the Voluntary Voting System Guidelines 2.0 draft, but urge the Commission to add the following under Principle 13: Data Protection: "The voting system does not use wireless technology or connect to any public telecommunication infrastructure". Given the fact that our election systems are being targeted via cyberattacks, it is imperative the VVSG prohibit connectivity to the public Internet through wireless modems or other means. Thank you for your consideration

5/28/2019 11:10 PTRIBBLE@DRMS.MS

5/28/2019 11:10 kpmueller@gmail.com

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5/28/2019 14:04 Jenniferscohn@gmail.com

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5/28/2019 14:06 Marcia.Rector@gmail.com

COMMENT PERIOD ENDS How to make a comment to the Election Assistance Commission
The Election Assistance Commission is responsible for setting the Voluntary Voting System Guidelines that determine many factors in how we vote. They are currently approving the new guidelines called the VVSG 2.0. Although these guidelines are an improvement, they have serious omissions that will undermine their ability to guarantee that all votes are counted as cast. We ask that you send this letter, or your own version of it to the EAC by 4pm on 5/20/19.

- 1) Use this form - the link is case sensitive. <https://www.eac.gov/vvsg-form/>
- 2) Copy and paste this letter into the form and send it.
- 3) Send a copy to SMART Elections.us here: <https://smartelections.us/contact-us>

We will publish your letters. To the Election Assistance Commission: We welcome the new VVSG 2.0 as a significant improvement to the current voting system guidelines. However as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I ask that you make sure

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8. support the ability to have an Use paper ballots that are verifiable!

5/28/2019 14:09 craig.bozman62@gmail.com

5/28/2019 14:09 Ingridbond5@gmail.com

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9. create a

5/28/2019 14:13 dorothymbrowne@aol.com

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trueamericaunconquerable@gmail.c

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9. create a digital ballot image that is identical to the paper ballot.

â€¢ The EAC must create a panel of election security experts made of academics and

5/28/2019 14:26 cathy.mcdonald@verizon.net

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5/28/2019 14:30 pndragon@ymail.com

5/28/2019 14:31 merlinjernigan@gmail.com

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The most secure voting systems use hand-marked, hand-counted paper ballots. Using ballot-marking devices, DRE™s and ballot reading devices makes elections less transparent, as well as vulnerable to manipulation by insiders or hackers. For the American People to have faith in the electoral process and for elections to have legitimacy,

5/28/2019 14:31 glennw444@yahoo.com

5/28/2019 14:31 91erik@gmail.com

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5/28/2019 14:32 lbstreet03@comcast.net

5/28/2019 14:32 triciaisenstein@me.com

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5/28/2019 14:33 jean183@yahoo.com

ENDS How to make a comment to the Election Assistance Commission The Election Assistance Commission is responsible for setting the Voluntary Voting System Guidelines that determine many factors in how we vote. They are currently approving the new guidelines called the VVSG 2.0. Although these guidelines are an improvement, they have serious omissions that will undermine their ability to guarantee that all votes are counted as cast. We ask that you send this letter, or your own version of it to the EAC by 4pm on 5/20/19. 1) Use this form - the link is case sensitive. <https://www.eac.gov/vvsg-form/> 2) Copy and paste this letter into the form and send it. 3) Send a copy to SMART Elections.us here: <https://smartelections.us/contact-us> We will publish your letters. To the Election Assistance Commission: We welcome the new VVSG 2.0 as a significant improvement to the current voting system guidelines. However as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I ask that you make sure

5/28/2019 14:34 srgirton@yahoo.com

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ALL APPROVED VOTING SYSTEMS WILL

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7. â€¦ use durable paper, not thermal paper.
8. â€¦ support the ability to have an

5/28/2019 14:34 ricardojparada@gmail.com

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5/28/2019 14:34 A2kjoyce@gmail.com

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5/28/2019 14:38 dhmacdon3@rcn.com

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5/28/2019 14:42 kwheel21@cox.net

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5/28/2019 14:43 Robison1948@frontiernet.net

happy about the new VVSG 2.0 as a significant improvement to the current voting system guidelines. HOWEVER, I have serious concerns..... as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I ask that you make sure that all systems approved by the VVSG 2.0 meet the following standards: NO APPROVED VOTING SYSTEM WILL :

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5/28/2019 14:43 jdandhelen@verizon.net

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5/28/2019 14:43 rcolborn2463@icloud.com

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5/28/2019 14:44 dmvollaro@gmail.com

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5/28/2019 14:44 2perrychan@gmail.com

consider the following with the utmost concern:
I agree and welcome the new VVSG 2.0 as a significant improvement to the current voting system guidelines. However as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I ask that you PLEASE make sure that all systems approved by the VVSG 2.0 meet the following standards: NO APPROVED VOTING SYSTEM WILL :

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5/28/2019 14:45 Chopstks@maine.rr.com

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Our voting machines are under attack and vulnerable to hacking. I demand that we voters have the option of using hand marked paper

5/28/2019 14:45 robinjwright@gmail.com

5/28/2019 14:45 hastings8@aol.com

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The real solution to a transparent and legal voting system is having paper ballots. Nothing less would be acceptable or could ensure the validity of each personâ€™s vote.

5/28/2019 14:46 dballgary@gmail.com

5/28/2019 14:49 t.garcia1@comcast.net

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5/28/2019 14:53 Velinawilliams@ymail.com

my city, Grosse Pointe Woods. Our system was not the latest high-end tech, nor was it the least tech. It was, however, capable of ensuring votes were recorded accurately, and the voters' trust was intact. The VVSG 2.0 is said to be a significant improvement to current voting system guidelines. But as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process is flawed because it is too reliant on input of voting system vendors. I ask that you make sure that all systems approved by the VVSG 2.0 meet the following standards: NO APPROVED VOTING SYSTEM WILL : *record votes directly to a computer memory without the voter reviewing a paper ballot. *have a modem or allow remote access. *allow the technical opportunity for a machine to change a ballot after the voter has cast it " even if the machine is under the control of malware. *be a hybrid machine " with a printer and a scanner in the same path. *encode votes using barcodes, QR codes, or any other format that is not readable by a voter without assistive technology. ALL APPROVED VOTING SYSTEMS WILL * allow for the use of hand-marked paper ballots - not just a paper trail created by a

5/28/2019 14:53 sdcoppa2@gmail.com

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5/28/2019 14:54 krisztinastar@hotmail.com

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7. â€¦ use durable paper, not thermal paper.
8. â€¦ support the ability to have an

5/28/2019 14:56 Hamptonsjoy@aol.com

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This article explains what we need to do to secure our elections. We must have Please develop guidelines that ban unsecured voting methods, including but not limited to: barcode voting, DREV voting, hybrid voting, as well as modems and remote access voting. The integrity of our voting process must not be compromised by voting methods that may be hacked by rogue nations, organizations or individuals. Thank you for your consideration

5/28/2019 14:58 Patr2ckk3lly@me.com

5/28/2019 14:58 Ptjasj@outlook.com

5/28/2019 14:59 Nbabak@aol.com

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5/28/2019 15:08 jimwilt@gmail.com

5/28/2019 15:08 Vzpickles@aol.com

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To whom it may concern: Please make sure our elections are secure. Jennifer Cohn has done superb investigative journalism and revealed a deeply flawed system. The people demand that all of you protect our votes. Ban DRE Voting Machines Ban Barcode Voting Ban Hybrid Voting Ban Modems and Remote Access People have died for our rights to a fair and honest election system. Please be honorable and do the right thing. Thank you, Carla W.

5/28/2019 15:09 lonbud@gmail.com

5/28/2019 15:13 Ccjr@aol.com

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5/28/2019 15:16 Rlmathews1@aol.com

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5/28/2019 15:18 sparklpop@gmail.com

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TAKE ACTION More Home WRITE THE EAC
TODAY TAKE ACTION ABOUT LEARN MORE
MAY 29TH 4PM - PUBLIC COMMENT PERIOD
ENDS How to make a comment to the Election
Assistance Commission The Election Assistance
Commission is responsible for setting the
Voluntary Voting System Guidelines that
determine many factors in how we vote. They
are currently approving the new guidelines
called the VVSG 2.0. Although these guidelines
are an improvement, they have serious
omissions that will undermine their ability to
guarantee that all votes are counted as cast. We
ask that you send this letter, or your own version
of it to the EAC by 4pm on 5/20/19. 1) Use this
form - the link is case sensitive.
<https://www.eac.gov/vvsg-form/> 2) Copy and
paste this letter into the form and send it. 3)
Send a copy to SMART Elections.us here:
<https://smartelections.us/contact-us> We will
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5/28/2019 15:27 robertoberon@gmail.com

(MPAS) is a private, non-profit, and nonpartisan disability rights organization that advocates for people with disabilities in Michigan. MPAS is pleased to offer written comments to the revised Voluntary Voter System Guidelines version 2.0. These comments were prepared by Noah Walker and Mark McWilliams of MPAS's™ Public Policy and Media Relations (PPMR) office. For more information, please contact Mark McWilliams at (517) 487-1755 or mmcwilliams@mpas.org. One of the major focuses in MPAS's™ public policy advocacy is on voting rights. Under the Help America Vote Act of 2002, people with disabilities have the right to vote privately and independently, have full physical access to the polls, and have full rights to accessing voting machines. However, in practice, people with disabilities have a 6.5% less turnout rate than people without disabilities. Most of the issues involve the issues of guardianship, the lack of access to voting machines, the lack of poll worker training on privacy and on the machines, and the issues involving stigma. The voluntary voter system guidelines 2.0 include good principles, emphasizing high quality design and implementation, transparency, system interoperability, equivalent and consistent voter

5/28/2019 15:30 nwalker@mpas.org

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ALL APPROVED VOTING SYSTEMS WILL

6. allow for the use of hand-marked paper ballots - not just a paper trail created by a machine.
7. use durable paper, not thermal paper.
8. support the ability to have an

5/28/2019 15:45 bobbisands911@gmail.com

you to protect our elections. We welcome the new VVSG 2.0 as a significant improvement to the current voting system guidelines. However as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I ask that you make sure that all systems approved by the VVSG 2.0 meet the following standards: NO APPROVED VOTING SYSTEM WILL :

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I beg you to secure our voting systems and ballot boxes by:

1. Requiring hand marked ballots
2. No bar codes on ballots
3. No Ballot Marking Devices
4. No wireless, internet or remote access to voting equipment.
5. Public hand counting audits
6. Background checks for voting machine vendors. No campaign contributions from vendors or parties representing vendors or history of crime.
7. Pass the PAVE Act
8. Back up paper poll books at each polling place.
9. Transparent and secure chain of custody.
10. No proprietary software in any election or voting equipment.
11. Use the paper, hand-marked ballots in a manual audit or recount, and comparing them to the electronic total.
13. Posted poll tapes outside the precincts should include breakdown of early voting.

Thank you,

5/28/2019 15:45 njbanyas@gmail.com

5/28/2019 15:45 fwclemmensen@gmail.com

hundred percent of independent election experts have come to the conclusion (not hard to understand) that only hand-marked paper ballots, which are human-readable and human-auditable, can close the many vulnerabilities that have been found with barcoded schemes. Your first priority should be making sure that elections are fair, and that they can be audited in a fair process. Hand marked paper ballots are the ONLY way to accomplish this. We welcome the new VVSG 2.0 as a significant improvement to the current voting system guidelines. However as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I ask that you make sure that all systems approved by the VVSG 2.0 meet the following standards: NO APPROVED VOTING SYSTEM WILL :

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3. "allow the technical opportunity for a machine to change a ballot after the voter has cast it " even if the

5/28/2019 15:47 carynhunt@hotmail.com

All systems approved the VVSG. 2.0 should meet the following standards: no approved voting system will 1) record votes directly without the voter reviewing a paper ballot 2) have a modem or remote access 3) allow the technical opportunity for a to machine change a ballot after voter has cast it 4) be a hybrid machine with printer and scanner in same path 5) encode votes using barcodes, QR codes or any other form that is Not readable by voter without technical assistance. All systems approved by the VVSG.2.0 will allow: 1) Hand marked paper ballots, not just a paper trail created by a machine. 2) Use durable paper not thermal 3) support the ability to have an accurate hand counted audit. 4) create a digital ballot image that is identical to the paper ballot. 5) create a panel of Election Security Experts made of academics and technical experts with no relationship to vendors and no vested interest in emerging systems. EAC must stop consulting vendors and their Representatives for technical

5/28/2019 15:47 altcsa@aol.com

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5/28/2019 15:48 Dbrown223@gmail.com

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5/28/2019 15:52 buell@acm.org

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5/28/2019 15:55 Meme2frmfl@aol.com

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5/28/2019 16:06 adohertyhome@gmail.com

5/28/2019 16:11 darla.howardramirez@gmail.com

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The EAC must create a panel of election security experts made of academics and technical experts with no relationship to vendors and no vested interest in emerging systems. The EAC needs to take input on the VVSG 2.0 from this panel - and other non-vested security experts on an ongoing basis. The EAC must stop consulting vendors and their

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7. â€¦ use durable paper, not thermal paper.
8. â€¦ support the ability to have an

5/28/2019 16:25 swardsaltini@icloud.com

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5/28/2019 16:30 katcowley44@gmail.com

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5/28/2019 16:33 Crooksgarcia@gmail.com

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5/28/2019 16:38 kdqd3@protonmail.com

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5/28/2019 16:51 ktqueste@gmail.com

US election process, about my ability as a voter to verify that my votes will be counted as I intended, and the ability of elections officials to audit election results. I am glad that EAC is attempting to improve VVSG. The new VVSG 2.0 presents a significant improvement to the current voting system guidelines. However as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process has been too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. This leaves the process flawed and could present concerns for voters. I ask that you make sure that all systems approved by the VVSG 2.0 meet the following standards: NO APPROVED VOTING SYSTEM WILL :

1. "record votes directly to a computer memory without the voter reviewing a paper ballot.
2. "have a modem or allow any remote access, to guard against potential hacking or other manipulation from remote locations.
3. "allow the technical opportunity for a machine to change a ballot after the voter has cast it " even if the machine is under the control of malware.
4. "be a hybrid machine " with a printer and a scanner in the same

As a voter I oppose the use of technology for voting in any form. Voting technology is too easily hacked. Votes aren't verifiable. Even scanning of paper ballots can be hacked. I'm completely in favor of paper, No Tech voting. Please regulate voting appropriately. Protect our most fundamental right. Thank you

5/28/2019 16:53 Joann.m.santiago@gmail.com

5/28/2019 16:53 tlmottl@aol.com

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5/28/2019 17:00 nancyma@earthlink.net

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5/28/2019 17:02 naomi37@hotmail.com

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I hope you are making sure that any new voting systems will be secure and will always properly record votes. There should be no remote access - too vulnerable to hackers. Voters should be able to verify that their vote says what they meant, without use of a QR code or bar code or anything like that. Voters should be able to use paper ballots. Please don't use voting system vendors for advice. They want what is easiest for them or what will make them a profit, security is not as important to them. Please do turn to security experts for advice. Bottom line - security of voting systems is extremely important and all guidelines should be in support

5/28/2019 17:07 cricketix@aol.com

5/28/2019 17:11 gailmwalker@yahoo.com

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5/28/2019 17:14 Activegrove@gmail.com

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After the trauma this country suffered in last election and now proof we were hacked by Russia. America deserves a safe secure voting method. No more! Kill the gerrymandered maps

5/28/2019 17:15 maryennem@gmail.com

5/28/2019 17:17 tomlynn50@yahoo.com

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5/28/2019 17:36 prife@netzero.net

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7. â€¦ use durable paper, not thermal paper.
8. â€¦ support the ability to have an

5/28/2019 17:40 Asmithziegler@gmail.com

COMMENT PERIOD ENDS How to make a comment to the Election Assistance Commission
The Election Assistance Commission is responsible for setting the Voluntary Voting System Guidelines that determine many factors in how we vote. They are currently approving the new guidelines called the VVSG 2.0. Although these guidelines are an improvement, they have serious omissions that will undermine their ability to guarantee that all votes are counted as cast. We ask that you send this letter, or your own version of it to the EAC by 4pm on 5/20/19.

- 1) Use this form - the link is case sensitive. <https://www.eac.gov/vvsg-form/>
- 2) Copy and paste this letter into the form and send it.
- 3) Send a copy to SMART Elections.us here: <https://smartelections.us/contact-us>

We will publish your letters. To the Election Assistance Commission: We welcome the new VVSG 2.0 as a significant improvement to the current voting system guidelines. However as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I ask that you make sure we'd like any voting system we use to be audited. I think we need hand marked paper ballots in all instances.

5/28/2019 17:49 eaglesrock714@gmail.com

5/28/2019 17:53 samshepp@gmail.com

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5/28/2019 17:58 TerriFowler@charter.net

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5/28/2019 18:00 luanabranscom24@gmail.com

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5/28/2019 18:15 djsumerford@gmail.com

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10. Ballot Secrecy should be refined to discriminate between the concept of privacy and ballot anonymity. The voter should be able to vote privately and without any coercion. The ballots, once voted, should not be possible to link to which voter cast the ballot. However, beyond that limitation, ballots should not contain voter-identifiable information by which the voter can be identified, and therefore, ballots can be -- as much as possible -- be considered public documents so that the public can independently confirm the result of the election. If a voter adds voter-identifiable data that would otherwise not be required, that should not obviate public disclosure. 2. Although there were many notices of how to submit comments, rarely was there any link to the actual documents. Every notice for comments should also provide the link to the document(s) being reviewed. 3. The document being reviewed is only a very high level set of goals and is hardly what is expected in terms of detailed requirements for voting systems. As a result, people are word-smithing at a very fine granularity hoping that minor changes will cause some larger result based on the subtle meaning of those very few words. I believe this is a bad practice and instead larger definitions and #BanDRE Voting Machines #BanBarcodeVoting #BanHybridVoting

5/28/2019 18:27 raylutz@citizenoversight.org

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5/28/2019 19:41 Lindsaymargaretf@gmail.com

ballots. To the Election Assistance Commission:
We welcome the new VVSG 2.0 as a significant improvement to the current voting system guidelines. However as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I ask that you make sure that all systems approved by the VVSG 2.0 meet the following standards: NO APPROVED VOTING SYSTEM WILL : 1. " record votes directly to a computer memory without the voter reviewing a paper ballot. 2. " have a modem or allow remote access. 3. " allow the technical opportunity for a machine to change a ballot after the voter has cast it " even if the machine is under the control of malware. 4. " be a hybrid machine " with a printer and a scanner in the same path. 5. " encode votes using barcodes, QR codes, or any other format that is not readable by a voter without assistive technology. ALL APPROVED VOTING SYSTEMS WILL 6. " allow for the use of hand-marked paper ballots - not just a paper trail created by a machine. 7. " use durable paper, not thermal

5/28/2019 19:41 Laurieadrian@gmail.com

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8. â€¦ support the ability to have an

5/28/2019 19:41 julie@shannondale.com

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5/28/2019 19:44 dmrogalla@yahoo.com

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5/28/2019 19:51 dparm917@yahoo.com

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5/28/2019 19:59 jsluka@msn.com

welcome your call for comments. As we have seen the last few years, America needs a secure voting system, and paper ballots are the best. Alameda County, where I live, uses hand-marked paper ballots, with electronic backup - they are scanned by hand - in case an election needs to be replicated. And the internal CA voting system is not connected to the internet, per the CA Secretary of State. The new VVSG 2.0 as a significant improvement to the current voting system guidelines. However as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I ask that you make sure that all systems approved by the VVSG 2.0 meet the following standards: NO APPROVED VOTING SYSTEM WILL :

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4. Not be a hybrid machine - with a printer and a scanner.

Addition needed for the VVSG-2.0 No approved vote system will;

- 1.) record votes directly to a computer memory
- 2.) have a modem or allow access
- 3.) be a hybrid machine
- 4) encode votes using barcodes, codes or any format voter can read.

Yes-All approved vote systems will:

- 1.) Hand marked paper ballots
- 2.) Durable paper not thermal
- 3.) Hand counted audit anonymity
- 4.) Create digital ballot image

*EAC must create a panel of election security experts (no shenanigans like relationship to vendor). EAC must stop consulting vendors & reps. for tech guidance. Its unethical and of course a conflict of

5/28/2019 20:01 marthops2@sonic.net

5/28/2019 20:04 Akoonce53@yahoo.com

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5/28/2019 20:06 Tcaudill4@gmail.com

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5/28/2019 20:07 doug_burton@hotmail.com

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5/28/2019 20:08 Jeepgirl9179@gmail.com

COMMENT PERIOD ENDS How to make a comment to the Election Assistance Commission
The Election Assistance Commission is responsible for setting the Voluntary Voting System Guidelines that determine many factors in how we vote. They are currently approving the new guidelines called the VVSG 2.0. Although these guidelines are an improvement, they have serious omissions that will undermine their ability to guarantee that all votes are counted as cast. We ask that you send this letter, or your own version of it to the EAC by 4pm on 5/20/19.

- 1) Use this form - the link is case sensitive. <https://www.eac.gov/vvsg-form/>
- 2) Copy and paste this letter into the form and send it.
- 3) Send a copy to SMART Elections.us here: <https://smartelections.us/contact-us> We will publish your letters. To the Election Assistance Commission: We welcome the new VVSG 2.0 as a significant improvement to the current voting system guidelines. However as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I ask that you make sure

5/28/2019 20:09 btreashosio@yahoo.com

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7. use durable paper, not thermal paper.
8. support the ability to have an

5/28/2019 20:10 marccamp@montefiore.org

happy to Hear that voting guides are being revised to keep safeguard the integrity of our elections. I have recently learned though that the new draft of the VVSG 2.0 does not provide adequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I ask that you make sure that all systems approved by the VVSG 2.0 meet the following standards: The APPROVED VOTING SYSTEM WILL :

1. NOT record votes directly to a computer memory without the voter reviewing a paper ballot.
2. NOT have a modem or allow remote access.
3. NOT allow any technical opportunity for a machine to change a ballot after the voter has cast it even if the machine is under the control of malware.
4. NOT be a hybrid machine with a printer and a scanner in the same path.
5. NOT encode votes using barcodes, QR codes, or any other format that is not readable by a voter without assistive technology.

ALL APPROVED VOTING SYSTEMS WILL ALSO

6. allow for the use of hand-marked paper ballots - not just a paper trail created by a machine.
- 7.

5/28/2019 20:10 remmers.page@gmail.com

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5/28/2019 20:24 lisa.campbell8@gmail.com

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5/28/2019 20:28 trisha.mcgreenera@gmail.com

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5/28/2019 20:28 erin.bdickerson@gmail.com

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7. â€¦ use durable paper, not thermal paper.
8. â€¦ support the ability to have an No More Ballot machine, Use a ballpen (ink) and paper of ballot. No more machine otherwise hacker may take my place. Thank you

5/28/2019 20:44 jmetzger800@gmail.com

5/28/2019 20:48 5zoebear@gmail.com

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8. â€¦ support the ability to have an

5/28/2019 20:55 choppnorm@cox.net

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5/28/2019 20:58 alvosio@msn.com

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5/28/2019 21:02 W.h.howard535@gmail.com

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9. | create a digital ballot image that is identical to the paper ballot.

• The EAC must create a panel of election security experts made of academics and technical experts with no relationship to vendors and no vested interest in emerging systems. The EAC needs to take input on the VVSG 2.0 from this panel - and other non-vested security experts on an ongoing basis. • The EAC must stop consulting vendors and their representatives for technical guidance. Vendors have in their best interest cost containment, not

5/28/2019 21:54 smarshroberts-shop74@yahoo.com

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8. support the ability to have an

5/28/2019 22:03 Jpeery59@gmail.com

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Guidelines 2.0 Principles and Guidelines
Comments U.S. Election Assistance Commission
1335 East-West Highway, Suite 4300 Silver
Spring, Maryland 20910 Subject: Please
strengthen Voluntary Voting System Guidelines
Dear Members of the Election Assistance
Commission: I strongly support the draft
Voluntary Voting System Guidelines (VVSG) and
commend the robust principles and guidelines
for software independence, auditability and
ballot secrecy. Given the fact that our election
systems are being targeted for interference
through cyberattacks, it is imperative that the
VVSG also prohibit connectivity to the public
Internet through wireless modems or other
means. I strongly urge the Commission to ban
modems in vote counting machines both to
protect data and to prevent manipulation and
urge the Commission to add the following to the
guideline under Principle 13: DATA
PROTECTION: "The voting system does not use
wireless technology or connect to any public
telecommunications infrastructure." Granted,
eliminating wireless modems and internet
connectivity will not guarantee our voting
machines can't be manipulated or hacked
through corrupted USB sticks, insider attacks, or
supply chain corruption. That is why, ultimately,

5/28/2019 22:35 lishchris@yahoo.com

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country see the rise of corruption happening all around us. The corruption has seeped into every corner of our politics and the highest level of our government. Please use these guidelines to insure that we can trust our election process in this new age of technology where elections are at risk to foreign attacks and greed of corruption. We welcome the new VVSG 2.0 as a significant improvement to the current voting system guidelines. However as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I ask that you make sure that all systems approved by the VVSG 2.0 meet the following standards: NO APPROVED VOTING SYSTEM WILL :

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Secure our voting machines from hacking I strongly support the draft Voluntary Voting System Guidelines (VMSG) and commend the robust principles and guidelines for software independence, auditability and ballot secrecy. Given the fact that our election systems are being targeted for interference through cyberattacks, it is imperative the VMSG also prohibit connectivity to the public Internet through wireless modems or other means. We should want to ban modems in vote counting machines both to protect data and to prevent manipulation. Therefore, I urge the Commission to add the following to the guideline under Principle 13: DATA PROTECTION: "The voting system does not use wireless technology or connect to any public telecommunications infrastructure." Indeed, eliminating wireless modems and internet connectivity will not guarantee our voting machines can't be manipulated or hacked through corrupted USB sticks, insider attacks or supply chain corruption. That is why ultimately all votes should be cast on paper ballots and all elections should be audited by manually counting a sample of the paper ballots, but this guideline is essential while we still use voting machines. Thank you for your

5/28/2019 23:11 smokey.ardisson@gmail.com

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It is important that all elections use paper ballots so that citizens who vote can be assured that their votes will count!

5/28/2019 23:29 dave@yost.com

5/28/2019 23:32 vmeyers@hanrahanmeyers.com

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7. â€¦ use durable paper, not thermal paper.
8. â€¦ support the ability to have an

5/28/2019 23:40 gaugelli@comcast.net

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5/28/2019 23:40 8m5cngyv6fx1@opayq.com

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5/28/2019 23:55 judith.gilford2@gmail.com

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7. use durable paper, not thermal paper.
8. support the ability to have an <https://smartelections.us/write-the-eac-today> I would like us (USA) to focus on election security for all upcoming elections...that means reproducible backup of electronic ballots.

5/29/2019 0:00 srethy@gmail.com

5/29/2019 0:09 waynerdavies@gmail.com

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8. support the ability to have an

5/29/2019 0:11 rmicone@Gmail.com

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8. â€¦ support the ability to have an

5/29/2019 0:12 beth.huxenstein@gmail.com

you for creating the new VVSG 2.0. It is a significant improvement to the current voting system guidelines. However, as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. In addition, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I urge you to ensure that all systems approved by the VVSG 2.0 meet the following standards:

NO APPROVED VOTING SYSTEM WILL :

1. Not record votes directly to a computer memory without the voter reviewing a paper ballot.
2. Not have a modem or allow remote access.
3. Not allow the technical opportunity for a machine to change a ballot after the voter has cast it even if the machine is under the control of malware.
4. Not be a hybrid machine with a printer and a scanner on the same ballot path.
5. Not encode votes using barcodes, QR codes, or any other format that is not readable by a voter without assistive technology.

ALL APPROVED VOTING SYSTEMS WILL

6. Not allow for the use of hand-marked paper ballots - not just a paper trail created by a machine.
7. Not use durable paper, not thermal paper.
8. Not support the ability to have an

5/29/2019 0:14 Jweiner123@optonline.net

As an engineer with years of software and technology experience, I write to support the following: NO APPROVED VOTING SYSTEM WILL

1. record votes directly to a computer memory without the voter reviewing a paper ballot.
2. have a modem or allow remote access.
3. allow the technical opportunity for a machine to change a ballot after the voter has cast it even if the machine is under the control of malware.
4. be a hybrid machine with a printer and a scanner in the same path.
5. encode votes using barcodes, QR codes, or any other format that is not readable by a voter without assistive technology.

ALL APPROVED VOTING SYSTEMS WILL

6. allow for the use of hand-marked paper ballots - not just a paper trail created by a machine.
7. use durable paper, not thermal paper.
8. support the ability to have an accurate hand-counted audit.
9. create a digital ballot

5/29/2019 0:27 Vikrmada1@hotmail.com

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5/29/2019 0:28 Juanita.e@gmail.com

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5/29/2019 0:34 RyanFinlay@Protonmail.com

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5/29/2019 0:42 Maffeomedia@icloud.com

5/29/2019 0:44 abcdw5@aol.com

Assistance Commission: We welcome the new VVSG 2.0 as a significant improvement to the current voting system guidelines. However as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I ask that you make sure that all systems approved by the VVSG 2.0 meet the following standards: NO APPROVED VOTING SYSTEM WILL :

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7. use durable paper, not thermal

5/29/2019 0:57 brookenortonlais@gmail.com

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8. â€¦ support the ability to have an

We MUST do all to protect our elections system , system wide. From making hand ballot back-ups required, to taking states to court who are engaged in voter fraud. Every voter must be on deck for this upcoming national emergency. Be vigilant to local corruption as well as national. Take responsibility for getting another to the

5/29/2019 1:01 aimeedearmon@yahoo.com

5/29/2019 1:02 valsaichek@gmail.com

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5/29/2019 1:04 sdbfo@yahoo.com

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5/29/2019 1:06 funk0049@hotmail.com

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5/29/2019 1:12 jfallstich@gmail.com

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5/29/2019 1:16 stephenspencer@gmail.com

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5/29/2019 1:20 singinghawk@me.com

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5/29/2019 2:23 joe.kasper@gmail.com

the Trace Research and Development Center at the University of Maryland, in response to the call for public comments on VVSG 2.0, which is posted at: <https://www.eac.gov/voting-equipment/voluntary-voting-system-guidelines/>. The Trace Center, founded in 1971, is the nation's oldest research center on Disability and Information and Communication Technologies. The Trace Center has been researching and developing voting prototypes and guidelines since 1998. Elements of Trace's research can be found in many voting systems today and Trace's early Web guidelines were used as the basis for WCAG 1.0 and 2.0 which Trace also provided the co-chair for, as well as 3 of the WCAG editors. We are specifically commenting on two of the guidelines from VVSG 2.0: Guideline 8.2 and Guideline 10.2. Comments on Guideline 8.2: Guideline 8.2 states that the voting system must meet "currently accepted federal standards for accessibility." We think that this approach (of incorporating other standards) is a good approach in general, but care will need to be taken in crafting the provision(s) underneath this general guideline. Incorporating other standards is good because it avoids the temptation to re-word provisions slightly. Re-wording perfectly good provisions

5/29/2019 2:33 jlazar@umd.edu

Commission: My name is Jeanette Hines. I go by "JC" Hines. I am a retired Paralegal. I take a serious interests in our government but more of my attention has been directed towards voting issues due to the horrendous scandals surrounding our voting systems throughout our Nation. I urge you to take note of the following notations and suggestions as I feel they are imperative in assisting in resolving some serious issues. We welcome the new VVSG 2.0 as a significant improvement to the current voting system guidelines. However as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I ask that you make sure that all systems approved by the VVSG 2.0 meet the following standards: NO APPROVED VOTING SYSTEM WILL : 1. " record votes directly to a computer memory without the voter reviewing a paper ballot. 2. " have a modem or allow remote access. 3. " allow the technical opportunity for a machine to change a ballot after the voter has cast it " even if the machine is under the control of malware. 4. "

5/29/2019 4:52 jchines2015@gmail.com

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5/29/2019 5:26 rawsaturn@hotmail.com

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5/29/2019 5:52 joecrowder@frontier.com

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5/29/2019 6:02 Carlothrow@gmail.com

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5/29/2019 6:33 mgkmystic@gmail.com

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5/29/2019 6:47 atudzin@gmail.com

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5/29/2019 7:16 yobusiness@outlook.com

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5/29/2019 7:21 johnegan42@gmail.com

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5/29/2019 7:22 zzbennett@hotmail.com

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5/29/2019 7:22 tthomas8398@yahoo.com

ENDS How to make a comment to the Election Assistance Commission The Election Assistance Commission is responsible for setting the Voluntary Voting System Guidelines that determine many factors in how we vote. They are currently approving the new guidelines called the VVSG 2.0. Although these guidelines are an improvement, they have serious omissions that will undermine their ability to guarantee that all votes are counted as cast. We ask that you send this letter, or your own version of it to the EAC by 4pm on 5/20/19. 1) Use this form - the link is case sensitive. <https://www.eac.gov/vvsg-form/> 2) Copy and paste this letter into the form and send it. 3) Send a copy to SMART Elections.us here: <https://smartelections.us/contact-us> We will publish your letters. To the Election Assistance Commission: We welcome the new VVSG 2.0 as a significant improvement to the current voting system guidelines. However as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I ask that you make sure

5/29/2019 7:32 Khawksworth@sbcglobal.net

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5/29/2019 7:37 kathryn.e.barker@gmail.com

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Please secure our elections ,and use hand marked paper ballots, no voting machines . Our elections are our voice. We know Russia has already tapered with our elections. Please stand up for We The People's voices .

5/29/2019 7:55 tiger_woody2003@yahoo.com

5/29/2019 7:58 pegasuspix@yahoo.com

5/29/2019 8:05 Twofleas@gmail.com

ALL electronic voting machines, including electronic vote counting machines have been found to be easily hackable. I, as well as many of my friends and colleagues, no longer trust the results of our elections. We want what the experts in this field recommend: publicly counted and audited, HAND MARKED paper ballots, not hybrid systems (BMD's should only be used for persons with disabilities). Hand marked paper ballots, coupled with rules that uncles a strict chain of custody are critical for election security. Secure, trustworthy elections are the cornerstone of any democracy. Please restore trust in our voting systems by requiring ALL states use HAND MARKED paper ballots.

welcome the new VVSG 2.0 as a significant improvement to the current voting system guidelines, as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. In light of the 2016 election tampering, this is unacceptable! Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. This, I ask that you make sure that all systems approved by the VVSG 2.0 meet the following standards: NO APPROVED VOTING SYSTEM WILL :

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5/29/2019 8:14 mcfarrenc@denison.edu

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5/29/2019 8:30 musinsky@oeb.harvard.edu

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5/29/2019 8:31 vewertman@cox.net

marking computers that the state of Georgia is considering purchasing. Officials have not made public their final decision, but it appears that the ES&S ExpressVote system is most favored. Dominion ImageCast is also being considered. Both models embed voter selections in problematic barcodes (ES&S) and QR codes (Dominion). Voters cannot read barcodes or QR codes, so when their votes are embedded in codes, voters have no idea if what they intended to cast was accurately recorded. When those same barcodes or QR codes are tabulatedâ€”not human readable marksâ€”the voter has absolutely no reassurance that their votes were counted as cast. If audits are attempted, they are meaningless because the data on which they are being audited is questionable. Voter chain of custody of the vote is a bedrock requirement in democratic elections. Ballot marking computers that embed votes in barcodes or QR codes remove any notion whatsoever that voters are in charge. The nationâ€™s top IT experts agree that security is compromised with all voting computers. Hand marking on paper is the most secure method to record votes. There is nothing to come between the voter and his recorded vote, and that authentic ballot becomes the ballot of record for audits. Reviewing the

5/29/2019 8:41 smcwethy@bellsouth.net

concerned about the security of our elections and have been reading information about possible upgrades. From what I understand, the new VVSG 2.0 is a significant improvement to the current voting system guidelines. However, I am concerned from what I have read that, as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. It is very important to me that I know my vote will be counted as I intended for it to be. Additionally, I am concerned that the drafting process has been flawed because it is too reliant on the input of voting system vendors. They would have motivation to provide biased information in order to promote their own products and historically may not have shown a commitment to election security. So that U.S. elections will be a model for secure and valid elections, I ask that you make sure that all systems approved by the VVSG 2.0 meet the following standards: NO APPROVED VOTING SYSTEM WILL :

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5/29/2019 8:41 ljeberle63@gmail.com

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8. â€¦ support the ability to have an accurate hand-counted audit.
9. â€¦ create a digital ballot image that is identical to the paper

We must have hand-marked paper ballots countrywide in time for the 2020 election AND no machines that are hooked up to the internet. Our Democracy depends upon that happening.

5/29/2019 8:42 shelleycampaign18@gmail.com

5/29/2019 8:42 jmuehle1@gmail.com

writing to you as a citizen who has a PhD in Computer Science and is very concerned about the likelihood that electronic voting machines can and will be tampered with. Vote totals could easily be falsified. There is some statistical, circumstantial evidence that this has already happened. But the nature of the e-voting machines means that there is literally no way to check. This should be stopped. The integrity of our vote is too important. We welcome the new VVSG 2.0 as a significant improvement to the current voting system guidelines. However as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I ask that you make sure that all systems approved by the VVSG 2.0 meet the following standards: NO APPROVED VOTING SYSTEM WILL :

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Please use only hand marked paper ballots so that we can ensure each vote is not tampered with!!! Please preserve this sacred American right!!! Please do not use voting machines that are easily manipulated after votes are cast!!!

5/29/2019 8:47 hdbooth@yahoo.com

5/29/2019 8:49 jeanfoster@carolina.rr.com

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6. allow for the use of hand-marked paper ballots - not just a paper trail created by a machine.
7. use durable paper, not thermal paper.
8. support the ability to have an

I worry about the integrity of our elections and admire the Netherlands' choice to return to paper ballots (I think using special pencils as well). I believe any electronic system is vulnerable, if only but vendors in some cases who lack accountability and might be corrupted/compromised. At a minimum,, require paper ballots that *must* be audited

Thank you for the opportunity to provide

5/29/2019 9:08 Calegraham@comcast.net

5/29/2019 9:11 214blumen@gmail.com

5/29/2019 9:13 edwin.smith@smartmatic.com

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5/29/2019 9:19 akrazz@comcast.net

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5/29/2019 9:25 craig.genmail@gmail.com

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5/29/2019 9:31 slingsong@yahoo.com

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8. support the ability to have an test pdf size

Please find comments of Disability Rights NC on VVSG 2.0 attached.

5/29/2019 9:40 tashalang925@msn.com

5/29/2019 9:47 sjones@eac.gov

5/29/2019 9:52 corye.dunn@disabilityrightsnc.org

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5/29/2019 9:55 public@hollybeavon.com

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5/29/2019 9:59 marymmclain@yahoo.com

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I am writing to request improvements in security for voting machines. Our democracy is so important, and the coming guidelines will affect our elections for at least 10 years. Thank you for your attention to this very important matter.

5/29/2019 10:01 publicwondering@gmail.com

5/29/2019 10:03 siobhan.leftwich@gmail.com

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1. record votes directly to a computer memory without the voter reviewing and verifying their selections on a paper ballot. The choices that are verified by the voter will be the choices used for tallying the votes.
2. have a modem, allow remote access or connect even incidentally to any computer, network, or network element that has been connected to a public network.
3. allow the technical opportunity for a machine to change a ballot, after the voter has cast it “ even if the machine is under the control of malware.
4. be a hybrid machine “ with a printer and a scanner in the same physical cabinet.
5. encode votes using barcodes, QR codes, or any other format that is not verifiable by a voter without assistive

5/29/2019 10:07 shugah@shugahworks.com

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5/29/2019 10:08 parth.patel091@gmail.com

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Please accept these comments regarding WSG 2.0 Principals and Guidelines on behalf of Disability Rights Texas. If you have questions, please contact Jeff Miller at jmiller@drtx.org or Secure our election systems. I'm not smart enough to suggest how you do it, but I know our election systems were hacked by a hostile foreign government. FIX IT to prevent it from happening again!

5/29/2019 10:08 Kimgermain@yahoo.com

5/29/2019 10:10 jmiller@drtx.org

5/29/2019 10:16 ron.wenger05@gmail.com

to your request for public comment as published in Federal Register:

<https://www.federalregister.gov/documents/2019/02/28/2019-03453/proposed-voluntary-voting-system-guidelines-20-principles-and-guidelines> our PDF document was uploaded to the following site:

https://www.regulations.gov/comment?D=EAC_FRDOC_0001-0077 Comment Tracking Number: 1k3-9a6f-q6mg and also at

<https://www.federalregister.gov/documents/2019/02/28/2019-03453/proposed-voluntary-voting-system-guidelines-20-principles-and-guidelines> Comment Tracking Number: 1k3-9a6f-w7s6 shortly after 11:00 AM Eastern on

5/29/2019. Please excuse the duplication if that causes any problem. Unfortunately we could not find a way to upload our carefully formatted comments into this web form and have used the means allowed in the notice to the Federal

Register. Members of the State Audit Working Group: Harvie Branscomb, Colorado Election Watcher, electionquality.com, harvie@electionquality.com Duncan Buell, Commissioner, Board of Elections and Voter Registration, Richland County, South Carolina (affiliation for information purposes only)

Sean Flaherty, Chair, Iowans for Voting

5/29/2019 10:18 harvie@electionquality.com

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5/29/2019 10:22 ginnyturne@gmail.com

Commission FROM: Republican National
Lawyers Association DATE: May 29, 2019
Thank you for the opportunity to comment on
the Voluntary Voting Systems Guidelines (VVSG)
2.0 Principles and Guidelines. The Republican
National Lawyers Association (RNLA) is the home
of Republican lawyers in the Republican Party.
The missions of the RNLA are advancing
professionalism; advancing open, fair, and
honest elections; advancing career
opportunities; and advancing Republican ideals.
Since 1985, RNLA has worked to ensure elections
are open, fair, and honest so that every eligible
voter's vote is counted and ineligible votes
are not counted. The United States has the
finest election system in the world and enjoys a
proud position as the leading, longest lasting
representative democracy in the world. Yet,
there is always work to be done to improve the
election system, and updating the VVSG is an
important step for the Election Assistance
Commission (EAC) to take to bring the
certification standards for many voting systems
used in America up to date with modern
technological standards. The EAC should be
commended for undertaking to update the VVSG
quickly after a quorum of commissioners was re-
established and for providing ample opportunity

5/29/2019 10:33 thielen@republicanlawyer.net

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5/29/2019 10:36 mpkrupa@verizon.net

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Comments attached regarding VVSG 2.0

5/29/2019 10:38 klvnlamar@gmail.com

5/29/2019 10:39 lwaterland@declasi.org

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5/29/2019 10:42 daneekaps@gmail.com

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5/29/2019 10:43 ryannkaplan@gmail.com

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Comments attached electronically, thank you. The attached Comments of the U.S. Technology Policy Committee of the Association for Computing Machinery and associated substantive Appendix are hereby timely submitted for the Commission's consideration per FR Doc. 2019-03453 as published in the Federal Register, Vol. 84, No. 40 on Thursday, February 28, 2019. We look forward to further assisting the Commission as its work in this important proceeding continues. Please contact me with any questions regarding the attached, or should you wish to consult with any of the Committee's experts. Thank you, Adam Eisgrau Director of Global Policy & Public <https://medium.com/@jennycohn1/election-security-goals-7cbcee2d7dbd>

5/29/2019 10:46 robertsmichelle5@gmail.com

5/29/2019 10:47 tonyd@disabilityrightsflorida.org

5/29/2019 10:50 eisgrau@acm.org

5/29/2019 10:51 docb8888@gmail.com

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ALL APPROVED VOTING SYSTEMS WILL

6. â€¦ allow for the use of hand-marked paper ballots - not just a paper trail created by a machine.
7. â€¦ use durable paper, not thermal paper.
8. â€¦ support the ability to have an

5/29/2019 10:56 isabellarizi@gmail.com

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5/29/2019 11:01 sooze1177@yahoo.com

5/29/2019 11:02 Billnorhome@yahoo.com

Please, please, please protect our elections!
Please implement these voting systems that will
keep our democracy safe. Iâ€™m begging.
ALL APPROVED VOTING SYSTEMS WILL

6. allow for the use of hand-marked paper ballots - not just a paper trail created by a machine.
7. use durable paper, not thermal paper.
8. support the ability to have an accurate hand-counted audit.
9. create a digital ballot image that is identical to the paper ballot.

The EAC must create a panel of election security experts made of academics and technical experts with no relationship to vendors and no vested interest in emerging systems. The EAC needs to take input on the VVSG 2.0 from this panel - and other non-vested security experts on an ongoing basis. The EAC must stop consulting vendors and their representatives for technical guidance. This is a conflict of interest, is unethical and is preventing security

5/29/2019 11:15 bradenrosec@gmail.com

you for the opportunity to submit this letter. We welcome the new VVSG 2.0 as a significant improvement to the current voting system guidelines. However as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I ask that you make sure that all systems approved by the VVSG 2.0 meet the following standards: NO APPROVED VOTING SYSTEM WILL :

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7. " use durable paper, not thermal

We are under attack. Hand marked paper ballots are our only hope in securing our democracy from this attack. Hand marked paper ballots and a hand count of these ballots is what we the American people need and demand for

5/29/2019 11:16 Pmh123@yahoo.com

5/29/2019 11:18 Roger@sopris.net

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5/29/2019 11:18 william.b.clark@gmail.com

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5/29/2019 11:32 adrienne.lacava@prodigy.net

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5/29/2019 11:33 zeina575@aol.com

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5/29/2019 11:42 Sally.moseley@gmail.com

5/29/2019 11:44 panthompson@hotmail.com

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5/29/2019 11:44 kristinmink@gmail.com

from Russia & other groups for a while now. We need the best election security nationwide. We welcome the new VVSG 2.0 as a significant improvement to the current voting system guidelines. However as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I ask that you make sure that all systems approved by the VVSG 2.0 meet the following standards: NO APPROVED VOTING SYSTEM WILL :

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ALL APPROVED VOTING SYSTEMS WILL

6. allow for the use of hand-marked paper ballots - not just a paper trail created by a We deserve the confidence in our elections that only hand marked paper ballots would provide. There is such an obvious effort to consolidate power against opposition, be it with gerrymandering, doctored videos or election meddling. My vote is my free speech. It needs an advocate for the banning of: Barcode Voting DRE Voting Hybrid Voting Modems and Remote Access We need hand marked paper ballots and a audit-able result Thank you, Sean

5/29/2019 11:44 kimosborn2@comcast.net

5/29/2019 11:45 nursekatie@live.com

5/29/2019 11:47 seancprevost@gmail.com

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In order to make our voting systems secure, there should be: No inappropriate, conflicted vendor involvement (use unaffiliated techs or academics) No barcode, DRE or hybrid voting No modems or remote access Handmarked paper ballots on durable paper! Please protect our

5/29/2019 11:50 acentola1@aol.com

5/29/2019 11:53 Bizbea@gmail.com

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5/29/2019 11:57 lefcarrolliv@gmail.com

5/29/2019 11:58 KEmery@TheWalkerGroup.com

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5/29/2019 12:05 Rhecht@rck3.com

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5/29/2019 12:06 mjhos1047@gmail.com

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5/29/2019 12:08 Carliescribano@yahoo.com

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Your job is to keep our elections safe. Any computer can be hacked. All our election systems should be on paper or they can be hacked. Do you want our republic to stand on a foundation of loose electrons? Bad foundations lead to structural collapse. If America is to continue as a republic we need something more secure than computer stored data. DO YOUR

5/29/2019 12:09 vreilly84@gmail.com

5/29/2019 12:12 Wynnealanwynne@aol.com

5/29/2019 12:12 eggfamily@bellsouth.net

5/29/2019 12:12 Wynnealanwynne@aol.com

Because voters should be able to know without question that their votes are counted and tallied accurately as cast, you should be talking and consulting with election security experts and computer scientists, not the voting machine vendors trying to sell their systems. All voting should be done using handmarked paper ballots and with the exception of those with disabilities requiring assistance, absolutely no machines should be used to mark ballots. There should be no barcodes because voters cannot read the barcodes to know if they are actually accurate. All vote counting machines should produce a digital ballot image that is public record. All paper ballots need to be on durable paper so that risk limiting audits can be performed. Because pretesting does nothing to assure that votes are actually counted and tallied accurately as cast, there must be a way to verify election results with stringent audits. This will increase voter confidence in elections. Please do what is right for the voters and create a voting system where voters can have confidence that their Your job is to keep our elections safe. Any computer can be hacked. All our election systems should be on paper or they can be hacked. Do you want our republic to stand on a foundation of loose electrons? Bad foundations lead to structural collapse. If America is to continue as a republic we need something more secure than computer stored data. DO YOUR

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5/29/2019 12:13 geniuslrg@cox.net

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5/29/2019 12:20 thomas.mumey@protonmail.com

5/29/2019 12:22 cherylj2@equipforequality.org

thoughts here: democracy depends on free and fair elections. Our votes must be secure, audits must be possible. I can not imagine a more fundamental necessity. To the Election Assistance Commission: We welcome the new VVSG 2.0 as a significant improvement to the current voting system guidelines. However as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I ask that you make sure that all systems approved by the VVSG 2.0 meet the following standards: NO APPROVED VOTING SYSTEM WILL :

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To save democracy and make it stronger, the EAC must issue guidelines that:
#BanDREVotingMachines #BanBarcodeVoting
#BanHybridVoting

5/29/2019 12:24 khimbalee@yahoo.com

5/29/2019 12:24 annemariamarti@yahoo.com

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8. support the ability to have an I want to have automatic voter registration, no illegal rigged ballot pick ups as was done in Carolina. I do not want to have massive illegal purged as was done in Texas. It is important not to have stated use election software from foreign countries. All voting machines need to have paper backup systems. Congress needs to keep foreign influence out of our electoral system. Congressional leaders, all candidates should be subject to prosecution if they meet secretly with foreign leaders to undermine

5/29/2019 12:27 meesposito@gmail.com

5/29/2019 12:29 Larlyssa@apl.com

5/29/2019 12:42 AJoustersWife@gmail.com

Electronic equipment cannot be trusted to verifiably record each person's vote accurately. Computers have proven to easy to hack, and Russia (and others) have proven to have the capability to interfere in US elections. Every ballot needs to be a hand marked paper ballot. The paper for these hand marked ballots needs to be durable enough to allow recounts as necessary. These ballots need to clearly show who the voter is voting for without the need for the voter to use an electronic scanning device. Fair and ACCURATE elections are the backbone of democracy (or democratic republics). The US needs to make sure that all elections, local to national, are both fair and ACCURATE. The use of technology can jeopardize this accuracy and I am VERY concerned with the integrity of our voting machines. NO machine is I hackable! The VVSG2.0 provides security and will NOT be able to assure voters that their votes are being counted as cast! PLEASE make sure that all systems approved by the VVSG2.0 NOT record votes directly to a computer memory without the voter reviewing a paper ballot, have a modem or allow remote access, allow the opportunity for a machine to CHANGE a ballot after the voter has cast it, be a hybrid machine, or encode using barcodes, QR codes, or any other format that is not verifiable by a voter without assistive technology. All APPROVED voting systems should allow for use of HAND-MARKED PAPER BALLOTS - NOT just a paper trail created by a machine, use durable paper NOT thermal paper, support the ability to have a accurate HAND COUNTED audit, and create a digital ballot image that is IDENTICAL to the paper ballot! PLEASE STOP consulting vendors and their representatives for technical guidance. That is a conflict of interest and is UNETHICAL! In light of the fact that just today we have been told that Russia DID interfere with our 2016

5/29/2019 12:45 g2a2l@aol.com

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Please direct any inquiries on Hart's submission to Samuel Derheimer, Director of Govt Affairs.

5/29/2019 12:50 mari@marireed.com

5/29/2019 12:57 sderheimer@hartic.com

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5/29/2019 12:59 a.aquariahu3@verizon.net

protect our democracy. We welcome the new VVSG 2.0 as a significant improvement to the current voting system guidelines. However as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I ask that you make sure that all systems approved by the VVSG 2.0 meet the following standards: NO APPROVED VOTING SYSTEM WILL :

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8. support the ability to have an We MUST have paper ballots. You MUST use the voting machines that DO NOT hook-up to the internet.

5/29/2019 13:01 boxspringm@comcast.net

5/29/2019 13:05 lindeebrauer@msn.com

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5/29/2019 13:12 ekuligofski@tampabay.rr.com

voter in McHenry County, Illinois. Over the last 3 elections, I have become acutely aware of the fragility of our voting system. In our county, as recently as the last election, we have had candidates left off ballots or the same candidate shown in two separate races. We have had voters in newer subdivisions with missing races on their ballot. We have had referendum questions missing entire paragraphs of language. And we have had votes not counted due to software glitches. Many of these issues are related to human error by our County Clerk's office. However, it has highlighted to me the importance of an informed voter, and the need for a voter to be able to confirm their votes. I understand that the new VVSG 2.0 is a significant improvement to the current voting system guidelines. Voting system vendors, who have not historically shown a commitment to election security, have had too much input. The following standards must be incorporated into VVSG 2.0: NO APPROVED VOTING SYSTEM WILL: ~~â€¢~~ Record votes directly to a computer memory without the voter reviewing a paper ballot. ~~â€¢~~ Have a modem or allow remote access. ~~â€¢~~ Allow the technical opportunity for a machine to change a ballot after the voter has cast it ~~â€¢~~ even if the machine is under the

5/29/2019 13:16 rrscifo4212@gmail.com

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5/29/2019 13:19 gnarly_lie@charter.net

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5/29/2019 13:24 ellen@cyclinfgar.com

the black box into a transparent box, ensuring that the results match and accurately represent the will of the voters. We are a nonpartisan organization whose mission for the last 15 years is to restore public ownership and oversight of elections, to work to ensure the fundamental right of every American citizen to vote and to have each vote counted as intended in a secure, transparent, impartial, and independently audited election process. We at AUDIT Elections USA are finding that many states have switched from the optical scanners to digital scanners. By the 2020 presidential election, about 75% of all hand-marked paper ballots are now counted by digital scanners that produce a public record called ballot images which are an exact copy front and back of the ballot. That good news! However, many jurisdictions that have digital scanners claim that they are preserving the ballot images when in reality they are only preserving the write-in ballot images only. As to the illegal destruction of ballot images, expert witness Dr. Thomas W. Ryan, who holds a Ph.D. in Electrical Engineering and has over 30-years'™ experience in digital image creation, processing and interpretation, said in his affidavit in our Arizona ballot images case: In Summary, deleting ballot images

5/29/2019 13:26 johnbrakey@gmail.com

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5/29/2019 13:27 ka1010@comcast.net

5/29/2019 13:29 mstroh@dr-wa.org

5/29/2019 13:30 Sziegenfuss13@comcast.net

I support paper ballots for the Election. Hacking into our computer systems is easy for people who are good with technology. Protect our vote

feedback on VVSG 2.0 and making the adoption of VVSG 2.0 a priority. As you may have already heard during the public hearings, VVSG 2.0 presents opportunity to increase the standards for voting systems ensuring the integrity, usability and accessibility of the next generation of voting systems. We support the structure of having the high-level principles and guidelines in the VVSG 2.0 standards and keeping the requirements and test assertions separate. We believe that this structure of separating guidelines and principles from details will allow the standard to be always "current" by allowing the guidelines to be very high level and requirements and test assertions to be detailed and more efficiently modified to meet the changing landscape. We believe a clear process must be defined regarding how the modifications should be completed and published. For example, it would be beneficial to: "Define processes on what requires a vote from Commissioners and what can be modified using a different process by which only "administrative approval" is necessary. It might also be beneficial to keep requirements and test assertions open to public comment/appeal at all times. If anyone has comments on any requirements and test

Please protect our vote by only using hand marked ballots. Do not use machines that a 12 year old can hack and change votes. Do not use anything that is connected via modem and could be hacked by a foreign government or our current corrupt administration.

5/29/2019 13:31 sramachand@pa.gov

5/29/2019 13:37 Rebels16u@aol.com

on VVSG 2.0 Principles & Guidelines

1. Adoption of the VVSG 2.0 Principles and Guidelines should be collectively evaluated with the upcoming Requirements and Test Assertions to allow for a comprehensive and thorough review of the proposed program in its totality. The VVSG 2.0 Principles & Guidelines are a high-level set of principles with descriptions of voting system functions and qualities. The VVSG must now be supplemented by documents that detail functional requirements for how systems can meet the new guidelines and obtain certification. This includes test assertions to be used by accredited laboratories (VSTLs) to validate that a system complies with the requirements. Manufacturers cannot move forward with substantive development and certification efforts without such information. These details represent important benchmarks for usability, accessibility, security and interoperability, amongst others, based on input from experts and stakeholders. Along with election officials, we aim to ensure that such outputs are anchored to the real world and can be useful for equipment use in live elections. What may at first seem an innocuous principle or guideline can end up being construed into an egregious requirement and/or test assertion.

5/29/2019 13:38 ian.piper@dominionvoting.com

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It is imperative that we use hand written ballots in any upcoming elections. Our democracy is at stake, and any other previous methods used in the past are unreliable in counting and securing our votes. Please make the necessary changes to ensure that every vote is counted. Thank you in advance for your consideration regarding Americans right free and fair elections.

5/29/2019 13:39 lydiaelise@gmail.com

5/29/2019 13:39 Stickradie@gmail.com

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8. â€¦ support the ability to have an

5/29/2019 13:39 lfisher@gyrhead.com

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Comments are attached via upload.

5/29/2019 13:40 sguiffrida@hotmail.com

5/29/2019 13:42 susan@electiondefense.org

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8. support the ability to have an Bar code voting machines and especially hybrid machines are needlessly easy to corrupt. If a huge state like California can manage hand marked ballots so can any other state. Why are we purposely sabotaging our democracy? Money? Political gain? Nothing is worse than loosing our country to criminals.

5/29/2019 13:42 charlottes0metimes@yahoo.com

5/29/2019 13:48 cgpapworth@msn.com

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5/29/2019 13:50 luelladuncan@msn.com

the black box into a transparent box, ensuring that the results match and accurately represent the will of the voters. We are a nonpartisan organization whose mission for the last 15 years is to restore public ownership and oversight of elections, to work to ensure the fundamental right of every American citizen to vote and to have each vote counted as intended in a secure, transparent, impartial, and independently audited election process. We at AUDIT Elections USA are finding that many states have switched from the optical scanners to digital scanners. By the 2020 presidential election, about 75% of all hand-marked paper ballots are now counted by digital scanners that produce a public record called ballot images which are an exact copy front and back of the ballot. That good news! However, many jurisdictions that have digital scanners claim that they are preserving the ballot images when in reality they are only preserving the write-in ballot images only. As to the illegal destruction of ballot images, expert witness Dr. Thomas W. Ryan, who holds a Ph.D. in Electrical Engineering and has over 30-years' experience in digital image creation, processing and interpretation, said in his affidavit in our Arizona ballot images case: In Summary, deleting ballot images

5/29/2019 13:51 johnbrakey@gmail.com

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5/29/2019 13:52 jahi.gist@gmail.com

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5/29/2019 13:55 Duncan.dean@att.net

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5/29/2019 14:02 Spbilleaud@yahoo.com

U.S. Election Assistance Commission 1335 East-West Highway, Suite 4300 Silver Spring, MD 20910 Public Comments on Voluntary Voting System Guidelines (VVSG) 2.0 Principles and Guidelines The Disability Rights New Mexico (DRNM) appreciates the opportunity to comment on the draft Voluntary Voting System Guidelines 2.0. Principles and Guidelines. DRNM is a private, non-profit organization whose mission is to protect, promote and expand the rights of persons with disabilities. We are the designated protection and advocacy (P&A) program for New Mexico, and as such we have authority under federal law to pursue legal, administrative and other remedies on behalf of persons with disabilities. The P&As were established by the United States Congress to protect the rights of people with disabilities and their families through legal support, advocacy, referral, and education. P&As are in all 50 states, the District of Columbia, Puerto Rico, and the U.S. Territories (American Samoa, Guam, Northern Mariana Islands, and the US Virgin Islands), and there is a P&A affiliated with the Native American Consortium which includes the Hopi, Navaho and San Juan Southern Paiute Nations in the Four Corners region of the Southwest. Collectively, the P&A Network is the

5/29/2019 14:03 ghousepian@drnm.org

comment on the Voluntary Voting System Guidelines 2.0 Principles and Guidelines. The CERT Coordination Center, part of the Software Engineering Institute, a Federally Funded Research and Development Center operated by Carnegie Mellon University, has been advising and working on computer security since 1988. Based on our experience with vulnerability management, we have the following two top-level recommendations: 1) The Principles and Guidelines should contain a principle for supplier or vendor practices, perhaps under a heading "maintainability." At a minimum, such a principle should include that the supplier support: a. Vulnerability management, including coordination and remediation of vulnerabilities in voting systems. b. Each vendor form a Product Security Incident Response Team (PSIRT), according to the FIRST PSIRT service framework (https://www.first.org/education/FIRST_PSIRT_Service_Framework_v1.0). 2) The Principles and Guidelines should recommend that anyone who finds a vulnerability in a voting system report them to the Department of Homeland Security, specifically the Cybersecurity and Infrastructure Security Agency's Vulnerability Management and Coordination team. We also have the following

5/29/2019 14:04 jspring@cert.org

regulations.gov as PDF] Verified Voting is pleased to see the VVSG 2.0 principles and guidelines finally moving forward. We are enthusiastic about the VVSG 2.0 structure and, with some reservations, about the content of the principles and guidelines. Full implementation of the VVSG 2.0 will, in time, help bring about voting systems that set new standards for universal usability, security, and verifiability. All these properties “backed by sound procedures” are essential to enable officials to run resilient elections, and to reassure voters that their votes have been cast as intended and counted as cast. We urge the EAC to allow the technical requirements and test assertions to be approved and revised without a vote of the commissioners. We agree with the TGDC, the NASED executive council, and others that for several reasons, these documents are best managed by technical staff, adhering to a well-defined process with broad consultation and opportunity for public comment. Verification and the VVSG Verified Voting especially welcomes Principle 9, which stipulates that a voting system “is auditable and enables evidence-based elections,” and the associated guidelines. No matter how otherwise usable and reliable a voting system may be, it is

5/29/2019 14:08 mark@verifiedvoting.org

Principle 8: Robust, Safe, Usable, and Accessible
In guideline 8.3, “measuring” for effectiveness, efficiency, and satisfaction seems vaguely defined. We recommend language that evokes a rigorous performance standard, such as “for effectiveness, efficiency, and satisfaction accuracy, efficiency, and satisfaction in marking, verifying, and casting their ballots.”

Principle 9: Auditable We recommend revising guideline 9.2 to underscore that vote records used to verify outcomes should also be voter-verified. Moreover, for the foreseeable future, we would require these records to be physical. Also, a “correct” election outcome is undefined. We suggest: “The voting system produces readily available physical records that voters could verify. These records provide the ability to check whether the election outcome corresponds with voters’ contest selections and, to the extent possible, identify the root cause of any irregularities.”

In guideline 9.4, audit efficiency is desirable, but audit validity is paramount. We recommend expanding the guideline: “The voting system supports efficient, valid audits carried out with best practices.”

Principle 10: Ballot Secrecy We agree with the comments of the Electronic Privacy Information Center (EPIC)

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5/29/2019 14:13 borax76@yahoo.com

5/29/2019 14:16 fitzgerald@epic.org

5/29/2019 14:23 joe@cdt.org

See pdf for full and complete comments from Joseph Lorenzo Hall, PhD and Maurice Turner of the Center for Democracy & Technology.

in the Computer Service Business. I worked with IBM Engineers designing Computer Systems, I understand hardware and software code. I ran for office, paid for a manual recount when the Early Voting was 20% different. The Handcount was 2% different than the ES&S DS/200 Count, resulting in a full handcount. When I asked how the ballot code comes into the County Election Clerk, the memory sticks arrived via UPS, in a "Baggie" for each of the machines. The Secretary of State and the County Clerk had no clue what Code was on those sticks from ES&S. I reviewed the DS/200 History, It has a history of 2% error. The Hand Count was 100 to 62. The machine count changed to 104 to 59. I could understand 102 to 58 , but how did the vote add 4 votes? I noticed the "Undervotes" did Not stop the machine, giving the option to the Voter to retrieve his ballot. I and another IBM retiree with over 70 years of Computer training surmised the Undervotes could be used to Add Votes. Done in Firmware aka hardware code imbedded in the Memory Sticks from ES&S. The bottom line is the ES&S and other computer based ballot counting machines are callable and easily manipulated. DEFCON and a Michigan College professor confirmed the ballot counting machines are easily hacked and code modified

5/29/2019 14:24 Activist47@gmail.com

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We must protect the election system from hacking including paper receipts for the election office and for the citizen. We must ensure network's and systems are hardened and

5/29/2019 14:25 Rosriver@embarqmail.com

5/29/2019 14:25 dmoore@midmich.edu

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5/29/2019 14:34 Onesky11@cox.net

PDF (all 7 parts) at federalregister.gov
(apparently same as regulations.gov) Comment
tracking number 1k3-9a6j-g9ch Public Comment
on the VVSG 2.0 Principles and Guidelines part 1
of 7 by Harvie Branscomb,
<http://electionquality.com> Major topics:
1) Need for VVSG 2) Transition strategy from
1.0 to 2.0 3) Relationship of P&G to
Requirements 4) Relationship of requirements
to test assertions or test procedures 5) Need for
balancing of Principles 6) Scope of VVSG “ need
for clarity and eventual expansion of scope
7) Role of Glossary 8) Process to create P&G
and Requirements 9) Process to coordinate
Glossary 10) Process to create test plans
11) Decentralization of testing 12) Role of
Commissioners in requirements and future P&G
13) Need for broad based review and input for
update of requirements 14) Discovery, appeal
methods for updating requirements 15) Defects
and strong points of principles 16) Missed
opportunities- effects of input from existing
legacy vendors 17) Need for realistic
interpretation of Guidelines 18) Relative need
to support future v. existing technologies and
methods 19) Inconsistencies with usage of
“cast” 20) Inadequate and restrictive usage
of the singular phrase “ballot” 21) Potential
No Bar codes! Paper ballots!

5/29/2019 14:36 harvie@electionquality.com

5/29/2019 14:36 a.mullaney@verizon.net

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5/29/2019 14:37 De181623@gmail.com

Guidelines (VVSG) 2.0 Principles and Guidelines
Disability Rights Nebraska Disability Rights
Nebraska is the designated Protection and
Advocacy agency for individuals with disabilities
in Nebraska and our agency was created to assist
individuals with disabilities and their families in
protecting and advocating for their rights. We
employ a combination of advocacy strategies,
including public policy education and advocacy,
so that Nebraskans with disabilities can exercise
the same rights, opportunities and choices
available to all citizens. We promote the
principles of equality, self-determination, and
dignity of persons with disabilities. Because we
have a history of advocacy within the electoral
process under the federal Protection and
Advocacy for Voter Access program, Disability
Rights Nebraska appreciates the opportunity to
comment on the draft Voluntary Voting System
Guidelines (VVSG) 2.0 Principles and Guidelines.
While we agree with the laudable intent of the
VVSG 2.0 and recognize that balancing a secure
yet open, easy, and transparent election process
is complex, we must raise a concern that VVSG
2.0's requirements will force compliant
voting systems to rely exclusively on a marked
paper ballot as the ballot of record. Paper ballot
systems are not fully accessible to people with

5/29/2019 14:37 eric@drne.org

PDF (all 7 parts) at federalregister.gov
(apparently same as regulations.gov) Comment
tracking number 1k3-9a6j-g9ch Public Comment
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of 7 by Harvie Branscomb,
<http://electionquality.com> Major topics in this
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procedures 10) Need for balancing of Principles
11) Scope of VVSG “ need for clarity and
eventual expansion of scope 6) Scope of VVSG
“ need for clarity and eventual expansion of
scope The current understanding is that VVSG
scope is limited to “evoting system” and that
is arguably limited to ballot design, ballot
creation and contest option presentation,
capture of selections by voters, interpretation
and adjudication, recording of cast vote records,
tabulation, reporting of results and auditing. It is
a fact that this set of functions does not describe
the election system. Nor does the quality
achieved in these functions necessarily result in
a credibly correct election. Remote voting
options and central count scenarios have caused
the above list to be sadly insufficient. Questions
remain about the applicability of the VVSG to the

5/29/2019 14:38 harvie@electionquality.com

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5/29/2019 14:38 tracybutler@comcast.net

Guidelines part 3 of 7 by Harvie Branscomb, <http://electionquality.com> Major topics:

- 12) Role of Commissioners in requirements and future P&G
- 13) Need for broad based review and input for update of requirements
- 14) Discovery, appeal methods for updating requirements
- 15) Defects and strong points of principles

12) Role of Commissioners in requirements and future P&G I believe it is a mistake to remove the Commissioners entirely from the path to decide the requirements and the test plans. This is because inevitably policy decisions must be made – even decisions that appear to be substantially technical in nature. Without a stable administrative decision-making capability, some requirements may end up crippled by excess influence by some faction of stakeholders such as the vendors who have existing investments and may exert pressure for retaining the status quo.

13) Need for broad based review and input for update of requirements What is obvious in the requirements that are in the draft today is that they are already inadequate to test devices and processes already being sold to election jurisdictions. And there are limitations built into the requirements that will cause problems for jurisdictions that are faced with the need to use

5/29/2019 14:39 harvie@electionquality.com

welcome the new VVSG 2.0 as a significant improvement to the current voting system guidelines. However as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I ask that you make sure that all systems approved by the VVSG 2.0 meet the following standards:

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1. â€¦ record votes directly to a computer memory without the voter reviewing a paper ballot.
2. â€¦ have a modem or allow remote access.
3. â€¦ allow the technical opportunity for a machine to change a ballot after the voter has cast it â€” even if the machine is under the control of malware.
4. â€¦ be a hybrid machine â€” with a printer and a scanner in the same path.
5. â€¦ encode votes using barcodes, QR codes, or any other format that is not verifiable by a voter without assistive technology.

ALL APPROVED VOTING SYSTEMS WILL

6. â€¦ allow for the use of hand-marked paper ballots - not just a paper trail created by a machine.
7. â€¦ use durable paper, not thermal paper.
8. â€¦ support the ability to have an

5/29/2019 14:39 nappyhill@gmail.com

welcome and was happy to see the new VVSG 2.0 as a significant improvement to the current voting system guidelines. However as drafted, my understanding is that the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as they were cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to our election security. I ask that you make sure that all systems approved by the VVSG 2.0 meet the following standards: NO APPROVED VOTING SYSTEM WILL :

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ALL APPROVED VOTING SYSTEMS WILL

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7. â€¦ use durable paper, not thermal

Please use paper ballots to ensure the best probability that our elections won't be tampered with again.

5/29/2019 14:40 ranjon2@yahoo.com

5/29/2019 14:40 mkjk84@gmail.com

Guidelines part 4 of 7 by Harvie Branscomb, <http://electionquality.com> Major topics:

16) Missed opportunities- effects of input from existing legacy vendors 17) Need for realistic interpretation of Guidelines 18) Relative need to support future v. existing technologies and methods

16) Missed opportunities- effects of input from existing legacy vendors

A read through the requirements suggests to me that there is already an embedded bias towards electronic voter intent capture in place of pre-printed ballots that are intended to be hand marked. This seems odd considering that preprinted hand marked ballots are the standard voting method in many if not most states and all mail ballot states. Vendors who sell ballot marking devices have recently been effectively marketing their electronic capture devices as a substitute for hand marked paper (e.g. Georgia) and this direction seems to be already perhaps too much reflected in the writing of many of the guidelines and the requirements as well. An example is 7.1 - The default voting system settings for displaying the ballot work for the widest range of voters, and voters can adjust settings and preferences to meet their needs. The original text of guideline 7.1 is obviously focused entirely on an electronic vote capture

5/29/2019 14:41 harvie@electionquality.com

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ALL APPROVED VOTING SYSTEMS WILL

7. â€¦ allow for the use of hand-marked paper ballots - not

5/29/2019 14:41 grace.marie85@gmail.com

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ALL APPROVED VOTING SYSTEMS WILL

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Safeguarding the integrity of our FREE, FAIR elections are the very BASICS to a functioning democracy! HAND-MARKED PAPER BALLOTS are the simplest, cheapest, most hack-proof method to guard our elections from foreign interference. This should be a BI-PARTISAN, American ISSUE!

5/29/2019 14:41 bbr4905@aol.com

5/29/2019 14:42 willowbrookroad@gmail.com

Guidelines part 5 of 7 by Harvie Branscomb, <http://electionquality.com> Major topics:

- 19) Inconsistencies with usage of "cast"
- 20) Inadequate and restrictive usage of the singular phrase "ballot"
- 21) Potential risk of nebulous definition of E2E
- 22) Potential risk of failure to fully support MMPB

19) Inconsistencies with usage of "cast"
Inconsistent usage of the key word "cast" creates ambiguity. "Cast" according to the Glossary is voter - centric, an action taken by voter. This is very sensible and should be retained. But usage in the VVSG 2.0 draft requirements in probably twenty other places refers instead to a system-centric action that ought to be referred to as "accepted" e.g. "accepted ballot" in place of "cast ballot". Other possible words to use to replace the system-centric meanings of the verb cast are: to "read" or to "count" or to "tabulate". In some places "cast" is clearly used to refer to the step that creates the CVR. This step is definitely not a voter action and not consistent with the Glossary definition. The appearance of "cast" within the three word phrase "CVR" is also sadly inconsistent, but by now unavoidable. I recommend to use the word "cast" (noun and adjective) to refer to the voter centric event

5/29/2019 14:42 harvie@electionquality.com

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ALL APPROVED VOTING SYSTEMS WILL

7. allow for the use of hand-marked paper ballots - not Please see the attached letter.

We can't have a functioning county without the very best election security:

1. Paper Ballots
2. Hand Marked by the voter
3. Hand Counted in public
4. Audit ability

*All must be in place before the 2020 election!

5/29/2019 14:43 kathymalone@gmail.com

5/29/2019 14:43 fred.nisen@disabilityrightsca.org

5/29/2019 14:43 cslay@umich.edu

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5/29/2019 14:43 marceac88@hotmail.com

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5/29/2019 14:43 Big-lake@comcast.net

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ALL APPROVED VOTING SYSTEMS WILL

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5/29/2019 14:43 kbarnick@cfl.rr.com

Guidelines part 6 of 7 by Harvie Branscomb, <http://electionquality.com> Major topics:

- 23) Huge benefit of election record transparency
- 24) Claims that stand as obstacles to ballot transparency
- 25) Need to define substantive, not absolute ballot anonymity

23) Huge benefit of election record transparency Another sometimes overlooked potential value to be obtained from future voting systems is a fabulous opportunity recent scanner technology is already delivering but some state laws have yet to catch up. Modern tabulation devices produce both scanned copies of ballots and the associated cast vote records for purposes of review and comparison. Risk limiting audits conducted by officials require comparison directly to the physical paper ballot for very good reasons. In addition to election judges required to do the auditing, a few members of the public may be able to attend to verify the audit quality. But with current technology now being sold, after appropriate ballot secrecy safeguards are in place, and subject to local laws about access to records, any interested party could perform a virtual manual post election review to their own satisfaction at home – recognizing that there may be some misrepresentation of the paper by the images.

5/29/2019 14:44 harvie@electionquality.com

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5/29/2019 14:44 ccarrollhaney@msn.com

5/29/2019 14:44 jen15g@hotmail.com

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5/29/2019 14:45 amy.reyer@reyerec.com

Guidelines part 7 of 7 by Harvie Branscomb, <http://electionquality.com> Major topics:

- 26) Separation of systematic against self-identified risks to anonymity
- 27) Value in reduction of styles
- 28) Means to reduce styles
- 29) Potential risk of failure to fully support public transparency of records
- 30) Removing the fear of multiple sheet ballots
- 31) Conclusion- will we achieve the evidence based public election?

26) Separation of systematic against self-identified risks to anonymity Requirements related to Ballot Secrecy should distinguish between means of substantive self-identification as opposed to any means of self-identification that is unreasonable to expect the voting system to remedy. At the same time the requirements should differentiate between risks of self-identification from systematic risks to anonymity that are entirely the responsibility of the election system and its designers and operators. Systematic forms of association of voter with a ballot sheet (out of control of the voter) deserve to be remedied in the design of the voting system as well as in its operation. Systematic risks to anonymity are applicable to solution via the VVSG requirements even though much of the risk is added by decisions to add special district elections to ballots. Rare styles are

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ALL APPROVED VOTING SYSTEMS WILL

7. â€¦ allow for the use of hand-marked paper ballots - not Only hand marked paper ballots and hand counting. No digital voting. No bar codes. No

5/29/2019 14:46 4thehaneys@msn.com

5/29/2019 14:46 Calenyc@yahoo.com

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5/29/2019 14:48 a.willow.in.the.wind@gmail.com

which I am in full agreement, as well as a pdf of my book relating to the vulnerabilities of computerized vote counting and the exploitation of those vulnerabilities. The EAC has an opportunity to lead here and by leading to make a difference as profound as any an observer of American politics could imagine. To the Election Assistance Commission: We welcome the new VVSG 2.0 as a significant improvement to the current voting system guidelines. However as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I ask that you make sure that all systems approved by the VVSG 2.0 meet the following standards: NO APPROVED VOTING SYSTEM WILL :

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5/29/2019 14:48 verifiedvote2004@aol.com

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Please secure our elections.

5/29/2019 14:49 Jschiller75@hotmail.com

5/29/2019 14:50 Stanmeers@twc.com

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5/29/2019 14:50 egaige@gmail.com

welcome the new VVSG 2.0 as a significant improvement to the current voting system guidelines. However as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I ask that you make sure that all systems approved by the VVSG 2.0 meet the following standards:

NO APPROVED VOTING SYSTEM WILL :

1. â€¦ record votes directly to a computer memory without the voter reviewing a paper ballot.
2. â€¦ have a modem or allow remote access.
3. â€¦ allow the technical opportunity for a machine to change a ballot after the voter has cast it â€” even if the machine is under the control of malware.
4. â€¦ be a hybrid machine â€” with a printer and a scanner in the same path.
5. â€¦ encode votes using barcodes, QR codes, or any other format that is not verifiable by a voter without assistive technology.
6. ... allow weighted election functions that use decimal counting methods. Votes must be counted as whole numbers.

ALL APPROVED VOTING SYSTEMS WILL

7. â€¦ allow for the use of hand-marked paper ballots - not

5/29/2019 14:51 susantolin@gmail.com

concerned about the definition of "ballot image" in the definitions found in the Glossary of VVSG 2.0. The definition states: ballot image Electronically produced record of all votes cast by a single voter. A ballot image might be a transient logical representation of the votes or an archival record (a cast vote record). This definition is inaccurate for several reasons. The old description of a ballot image was the computer printout produced by a DRE. But now all digital scan voting systems such as the ES&S DS200 automatically create a true ballot image, which is essentially a photograph of the ballot. The votes are counted from the image, NOT from the paper ballot itself. This is the way the system works. A digital image is ALWAYS created in order to count the votes. A digital image, called a ballot image, is part of the chain-of-custody of each vote. It is what has actually been used to count the votes and must be retained for 22 months according to federal law. It is NOT correct to say that a ballot image may be a "transient" logical representation. Ballot images must be preserved and maintained. Ballot images are invaluable for forensic examination of problems in an election, such as, for example, what caused abnormally high overvotes or undervotes. They are also vitally

5/29/2019 14:51 susanpynchon@gmail.com

5/29/2019 14:52 Lindsey_Kerr@Rules.Senate.gov

may concern: Ballot images are not transient
itâ€™s what the scanner counts In the Voluntary
Voting System Guidelines Overview Summary:
The VVSG Principles and Guidelines The
following needs clarification, regarding ballot
images. As written in Principles and Guidelines.
----- ballot imageâ€œ Electronically
produced record of all votes cast by a single
voter. A ballot image might be a transient logical
representation of the votes or an archival record
(a cast vote record).â€œ----- We at AUDIT
Elections USA are finding that many states have
switched from the optical scanners to digital
scanners. By the 2020 presidential election,
about 75% of all hand-marked paper ballots are
now counted by digital scanners that produce a
public record called ballot images which are an
exact copy front and back of the ballot. That
good news! However, many jurisdictions that
have digital scanners claim that they are
preserving the ballot images when in reality they
are only preserving the write-in ballot images
only. As to the illegal destruction of ballot
images, expert witness Dr. Thomas W. Ryan,
who holds a Ph.D. in Electrical Engineering and
has over 30-yearsâ€™ experience in digital image
creation, processing and interpretation, said in
his affidavit in our Arizona ballot images case:
As you consider the new VVSG 2.0, please
further bolster US election security by specifying
the exclusive use of hand-marked paper ballots
as the only way to assure accuracy of our US
vote and elections. The digital systems currently
used or under consideration are too often
vulnerable to manipulation, either by a
"permission to cheat" (!) option, or modem use,
which opens the system to hacking. The major
companies behind these machines have a
partisan agenda. Hand marked paper ballots, as
well as post-election audits, are essential to
assure that our representative democracy is
truly representing the will of America's voters.
Thank you. For further information, please see
the research of Jennifer Cohn, either via her
writing in Medium or her Twitter feed
@jennycohn1 - she is attorney and concerned

5/29/2019 14:53 johnbrakey@gmail.com

5/29/2019 14:54 anne@islandfilmworks.com

5/29/2019 14:54 cluser1968@gmail.com

5/29/2019 14:54 swmartin@sbcglobal.net

The only proven secure voting system is with Hand Marked Paper Ballots coupled with secure handling, storage and proper audits. Anything less invites tomfoolery. Please Ban Barcode Voting Please Ban DRE Voting Please Ban Hybrid Voting Please Ban Modems And Remote Access Hand marked ballots are the only way to have a fair elections.

very well aware that the rest of these comments are a 'form letter.' However, I am very interested in/inolved with various organizations that focus on ensuring that our voting systems are secure and replicable. And thus, the comments below, especially those that speak to a paper ballot for EVERYONE except perhaps those with certain disabilities AND over reliance on vendors are two issues that I can speak about with knowledge and passion. Making sure that the EAC's guidance clearly addresses these two issues is critical to helping rebuilt voters' confidence in elections and this is the bedrock of our democracy. We welcome the new VVSG 2.0 as a significant improvement to the current voting system guidelines. However as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I ask that you make sure that all systems approved by the VVSG 2.0 meet the following standards: NO APPROVED VOTING SYSTEM WILL : 1. â€¦ record votes directly to a computer memory without the voter reviewing a paper ballot. 2. â€¦ have a

5/29/2019 14:54 bvaandr@earthlink.net

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5/29/2019 14:55 yamiyugi392000@yahoo.com

5/29/2019 14:55 christajmartin@gmail.com

welcome the new VVSG 2.0 as a significant improvement to the current voting system guidelines. However as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I ask that you make sure that all systems approved by the VVSG 2.0 meet the following standards: NO APPROVED VOTING SYSTEM WILL :

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5. â€¦ encode votes using barcodes, QR codes, or any other format that is not readable by a voter without assistive technology.

ALL APPROVED VOTING SYSTEMS WILL

6. â€¦ allow for the use of hand-marked paper ballots - not just a paper trail created by a machine.
7. â€¦ use durable paper, not thermal paper.
8. â€¦ support the ability to have an No barcode voting. No DRE voting No hybrid voting No modems or remote access. Protect

5/29/2019 14:56 delphiniabee@aol.com

5/29/2019 14:58 Lotus212@gmail.com

5/29/2019 14:59 susanpynchon@gmail.com

5/29/2019 14:59 shugah@shugahworks.com

We hope you will extend the comment period because you were sending out the wrong link to this Comment section. In brief, we at Florida Fair Elections Coalition are completely opposed to ballot-marking devices for all voters. BMDs are a civil rights issue. Just as voters and minority voters were targeted in certain jurisdictions by placing too few DREs in a precinct or early voting site, the same thing will inevitably happen with BMDs. There is no reason to use anything other than hand-marked paper ballots, which only require a pen and an inexpensive voting booth. A BMD such as the AutoMark for voters with disabilities provides the same ballot as is being voted on by everyone else. But the vendors want the new expensive BMDs which will end up creating long lines and suppressing the vote. Thank you, Susan Pynchon
This letter was approved by Rich DeMillo - Professor of Computing Georgia Tech
Bennie Smith - Election Commissioner Memphis TN
Jan BenDor, Statewide Coordinator, Michigan Election Reform Alliance
Virginia Martin - Election Commissioner - Columbia County NY

significant step forward in improving voting equipment. We particularly applaud the separation of principles and implementation details, because technology moves too fast for rules to keep up, while strong design principles are long lasting enough to merit enshrining. We also applaud the focus on both security and accessibility, as we believe both are critical to conducting free and fair elections. In that vein, we humbly propose three points to make the VVSG recommendations even more effective: 1/ make it easier to innovate safely by focusing on measured outcomes over prescribed mechanisms. Specifically: - 1.1 could leave more open the possibility of new/improved election processes, as long as they allow voters to easily cast paper ballots and election officials to tally those ballots. - 6.2 prescribes that preparation and casting of ballots should be doable without any assistance, for voters of all abilities. This constraint, similar to a VVSG1.1 clause, is known to significantly raise equipment cost and reduce reliability. The outcome here could be more focused on ballot privacy. Assistance, rather than banned altogether, should be acceptable as long as it is simple to provide and doesn't endanger voter privacy. 2/ encourage even more transparency. - 3.1 mandates that equipment

5/29/2019 14:59 ben@voting.works

are my further comments on VVSG 2.0 guidelines. Most important, and key to future elections: The guidelines must ensure evidence-based elections. The best technical way to do that given today's technology is to mandate true auditability by requiring hand marked paper ballots be made available to all voters, and for mandatory meaningful audits to actually be performed before certifying results. (I am unclear if VVSG 2.0's scope permits these requirements, as it seems to be intentionally limited only to the actual equipment used to directly record votes. However, it is fundamentally impossible to recommend security practices with such limitations, so I am ignoring them and so should the EAC. At minimum, to avoid doing harm, the VVSG 2.0 guidelines must warn that they must be used in the context of a fully auditable overall system.) The use of Ballot Marking Devices is of course necessary in some circumstances for some people, and they should be provided for all who opt for them. The majority, however, should not be forced to use them. This is not, as some have stated, a "separate but equal" policy, any more than having both elevators and stairs is. It is key to ensure full participation that BMD's be made as secure as possible, and the rest of the We need more oversight regarding big contracts to election machine vendors with their proprietary software & closed door meetings with DHS. Who makes the decisions about which machines are purchased? This should be

5/29/2019 15:00 john.panzer@gmail.com

5/29/2019 15:00 klane418@gmail.com

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6. ... allow weighted election functions that use decimal counting methods. Votes must be counted as whole numbers.

ALL APPROVED VOTING SYSTEMS WILL

7. â€¦ allow for the use of hand-marked paper ballots - not

5/29/2019 15:01 rebkatrip@yahoo.com

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6. ... allow weighted election functions that use decimal counting methods. Votes must be counted as whole numbers.

ALL APPROVED VOTING SYSTEMS WILL

7. â€¦ allow for the use of hand-marked paper ballots - not just a paper trail created by a machine, except for accommodations made for voters with disabilities.
8. â€¦ use durable paper, not Hand-marked paper ballots!!! not just a paper trail created by a machine. No remote access to any machine!!

5/29/2019 15:01 yvettedube@gmail.com

5/29/2019 15:02 dvmcmahon@gmail.com

welcome the new VVSG 2.0 as a significant improvement to the current voting system guidelines. However as drafted, the VVSG 2.0 provides inadequate security and does not assure voters that their votes are being counted as cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I ask that you make sure that all systems approved by the VVSG 2.0 meet the following standards: NO APPROVED VOTING SYSTEM WILL :

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ALL APPROVED VOTING SYSTEMS WILL

7. â€¦ allow for the use of hand-marked paper ballots - not

5/29/2019 15:03 jmoor628@gmail.com

5/29/2019 15:04 snewton@disabilitylawcenter.org

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5/29/2019 15:05 steveasumner@protonmail.com

along time election protection volunteer working to improve election security in New York. We currently use auditable scanners and handmarked paper ballots, but that system is under threat from the Dominion ICE and ESS Expressvote,, combining printers and scanners in the same machine. This can contaminate the paper trail and render audits unreliable. I welcome the new VVSG 2.0 as a significant improvement to the current voting system guidelines. However as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I ask that you make sure that all systems approved by the VVSG 2.0 meet the following standards: NO APPROVED VOTING SYSTEM WILL : 1. € record votes directly to a computer memory without the voter reviewing a paper ballot. 2. € have a modem or allow remote access. 3. € allow the technical opportunity for a machine to change a ballot after the voter has cast it € even if the machine is under the control of malware. 4. € be a hybrid machine € with a printer and a

5/29/2019 15:05 allegrad@aol.com

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5/29/2019 15:05 Tfantasia@sda-architects.com

TAKE ACTION ABOUT LEARN MORE MAY 29TH
4PM - PUBLIC COMMENT PERIOD ENDS How to
make a comment to the Election Assistance
Commission The Election Assistance Commission
is responsible for setting the Voluntary Voting
System Guidelines that determine many factors
in how we vote. They are currently approving
the new guidelines called the VVSG 2.0. Although
these guidelines are an improvement, they have
serious omissions that will undermine their
ability to guarantee that all votes are counted as
cast. We ask that you send this letter, or your
own version of it to the EAC by 4pm on 5/20/19.
1) Use this form - the link is case sensitive.
<https://www.eac.gov/vvsg-form/> 2) Copy and
paste this letter into the form and send it. 3)
Send a copy to SMART Elections.us here:
<https://smartelections.us/contact-us> We will
publish your letters. To the Election Assistance
Commission: We welcome the new VVSG 2.0 as
a significant improvement to the current voting
system guidelines. However as drafted, the VVSG
2.0 provides inadequate security and will not be
able to assure voters that their votes are being
counted as cast. Additionally, the drafting
process has been flawed because it is too reliant
on the biased input of voting system vendors,
who have not historically shown a commitment

5/29/2019 15:05 joanwharran@outlook.com

TV just showed that 46 of the 50 states have out of date voting machines, that can not be updated with security updates. We need machines that 1) will require that every electronic vote be verified by a paper ballot counter before going into database 2) machines that cannot be electronically accessed 3) corrections are marked in the machine and the paper ballot, so a larger count is not made - During Bush and Gore election I used an electronic machine that was not working correctly. I pushed the button for Gore and it registered as Bush. I complained and wound up voting 3 more times before Gore came up. After the 2016 election, I am not sure the 3 votes for Bush were erased. I voted under the instruction of the election monitor 4)use regular printer paper 5)be able to audit the electronic version and match to the paper trail 6)be able to vote on paper ballots that are counted by an electronic counting machine 7)have enough voting locations for the voters of the precinct. They do not need all electronic machines, you could have counters for paper machines which is less expensive than electronic machines in precincts. Here is an article about a new machine that has been created in California that looks

5/29/2019 15:22 pjw2748@yahoo.com

welcome the new VVSG 2.0 as a significant improvement to the current voting system guidelines. However as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I demand as a citizen of the United States that you ensure all approved systems meet the following standards: NO APPROVED VOTING SYSTEM WILL

1. record votes directly to a computer memory without the voter reviewing a paper ballot.
2. have a modem or allow remote access.
3. allow the technical opportunity for a machine to change a ballot after the voter has cast it - even if the machine is under the control of malware.
4. be a hybrid machine - with a printer and a scanner in the same path.
5. encode votes using barcodes, QR codes, or any other format that is not verifiable by a voter without assistive technology.
6. allow weighted election functions that use decimal counting methods. Votes must be counted as whole numbers.

ALL APPROVED VOTING SYSTEMS WILL

7. allow for the use of hand-

5/29/2019 15:35 thenecessarythrowaway@gmail.com marked paper ballots - not just a paper trail

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ALL APPROVED VOTING SYSTEMS WILL

7. allow for the use of hand-marked paper ballots - not An election system where the actual vote can not be read and reviewed by the voter is not valid. Any election system that can not be audited by the poll worker is not valid. Results shown and counted in bar codes, QR codes and scan codes are invalid results as the cast vote is not readable by the average poll worker.

5/29/2019 15:47 todd.williams@m3eg.com

5/29/2019 15:51 carl@cartertaxassociates.com

concerned about the following section in the VVSG 2.0: 1.2-B.14 "Recallable ballots. The voting system must be capable of gathering and recording votes within a voting process that allows the decision of whether to count a particular ballot to be deferred until after election day. Discussion Unique identification of each recallable ballot is needed; security-related requirements dealing with this identification are in TBD. This is language designed to deceive! What it is really saying is that YOU HAVE LOST YOUR SECRET VOTE. It means that your ballot can be tracked and connected back to you in case they need to recall your ballot for some reason after the election. The secret vote, or secret ballot, is one of the foundations of elections in our nation. The EAC cannot allow itself to get so caught up in technology that it forgets the basic principles of a free and fair election. I'm serious when I say that you need some political science or civics professors on your committees in addition to technical people to remind you of some important basic elements of an election. The ability to recall a ballot is being done in North Carolina and it is a DISASTER. The state is tracking the ballot of every voter in Early Voting and vote-by-mail, with the ability to tie each ballot back to an

5/29/2019 15:57 susanpynchon@gmail.com

may concern: Voting is a secret process; counting is a public process. Please do not allow our ballot to become a "Recallable ballots." We live in the age of big data; we now have to be concerned about being micro-targeted. In the Voluntary Voting System Guidelines Overview Summary: The VVSG Principles and Guidelines The following needs clarification, regarding "Recallable ballots." As written in Principles and Guidelines. ----- "1.2-B.14 "Recallable ballots" "The voting system must be capable of gathering and recording votes within a voting process that allows the decision of whether to count a particular ballot to be deferred until after election day. Discussion Unique identification of each recallable ballot is needed; security-related requirements dealing with this identification are in TBD"----- In most states, voters have a unique voter identification number. This helps the election office keep track of voters in a voter registration database and allows voters to check to see if their ballot has been counted. This process is normal and acceptable. However, in North Carolina, they take this a step further by putting the unique voter identification number on the ballot itself, for all early voted, and absentee ballots, which account for at least 50% After listening to the video, I have to say I agree with the first public speaker, who spoke in OPPOSITION to the approval of VVSG 2.0. This is too high level, with far too many "quishy" words like "ballot", "best practices", does not deal sufficiently with paper ballot systems, which are becoming the most standard approach, rather than electronic. THIS NEEDS TO BE IMPROVED. This contains glaring gaps and does not define the process to fill the gaps and how the public can be involved in the process. This is a VERY important topic. We need to get our elections under control. But this is an almost worthless document and is a step backwards. Passing the buck and not actually coming up with legitimate standards is not what this group should be

5/29/2019 16:02 johnbrakey@gmail.com

5/29/2019 16:03 raylutz@citizenoversight.org

5/29/2019 16:07 csgentry@yahoo.com

5/29/2019 16:12 fred.nisen@disabilityrightsca.org

5/29/2019 16:14 griffin@conceptfarm.com

Why are we hearing about this less than an hour b4 deadline? Ive been trying for more than a year to get info on how we are updating & protecting our elections. Nothing has been done! Registration & Old voting methods should be abandoned. there has been plenty of time to recruit software techs & develop modern methods. Nothing. maybe every voter could receive a new voter 'chip' card that xreferences & verifies prev voter info. That card would then match the ballot code w the voter card. It could be done by voter choice either by in person at polling booth, by mail or online. There must be thousands of software geniuses who could Resending my comment after removing hyphens from filename, per email from Cliff Tatum. No Barcodes No Hybrid Voting No DRE Voting Paper Ballots EVERYWHERE.

welcome the new VVSG 2.0 as a significant improvement to the current voting system guidelines. However as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I ask that you make sure that all systems approved by the VVSG 2.0 meet the following standards: NO APPROVED VOTING SYSTEM WILL : 1. â€¦ record votes directly to a computer memory without the voter reviewing a paper ballot. 2. â€¦ have a modem or allow remote access. 3. â€¦ allow the technical opportunity for a machine to change a ballot after the voter has cast it â€œ even if the machine is under the control of malware. 4. â€¦ be a hybrid machine â€œ with a printer and a scanner in the same path. 5. â€¦ encode votes using barcodes, QR codes, or any other format that is not verifiable by a voter without assistive technology. 6. ... allow weighted election functions that use decimal counting methods. Votes must be counted as whole numbers. ALL APPROVED VOTING SYSTEMS WILL 7. â€¦ allow for the use of hand-marked paper ballots - not

5/29/2019 16:18 Stanmeers@twc.com

5/29/2019 16:20 ckg1168@yahoo.com

We need secure elections and paper ballots. As much as it feels like a step backwards, paper can not be hacked.

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5/29/2019 16:27 donnamayo@alum.mit.edu

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ALL APPROVED VOTING SYSTEMS WILL

7. â€¦ allow for the use of hand-marked paper ballots - not

5/29/2019 16:29 dfleck2001@yahoo.com

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5/29/2019 16:30 allymeers@twc.com

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5/29/2019 16:34 Lmorgenstern@comcast.net

5/29/2019 16:36 sramachand@pa.gov

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ALL APPROVED VOTING SYSTEMS WILL

7. â€¦ allow for the use of hand-marked paper ballots - not [resubmission of comments PDF]

5/29/2019 16:41 wwjeca@gmail.com

5/29/2019 16:50 mark@verifiedvoting.org

5/29/2019 17:00 mstroh@dr-wa.org

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ALL APPROVED VOTING SYSTEMS WILL

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5/29/2019 18:04 mikeal.beland@gmail.com

Commission: We welcome the new VVSG 2.0 as a significant improvement to the current voting system guidelines. However as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I ask that you make sure that all systems approved by the VVSG 2.0 meet the following standards: NO APPROVED VOTING SYSTEM WILL : 1. â€¦ record votes directly to a computer memory without the voter reviewing a paper ballot. 2. â€¦ have a modem or allow remote access. 3. â€¦ allow the technical opportunity for a machine to change a ballot after the voter has cast it â€œ even if the machine is under the control of malware. 4. â€¦ be a hybrid machine â€œ with a printer and a scanner in the same path. 5. â€¦ encode votes using barcodes, QR codes, or any other format that is not verifiable by a voter without assistive technology. 6. ... allow weighted election functions that use decimal counting methods. Votes must be counted as whole numbers. ALL APPROVED VOTING SYSTEMS WILL 7. â€¦ allow for the use

Please accept the submission from the Arizona Center for Disability Law

5/29/2019 18:12 heidiescobar1@gmail.com

5/29/2019 18:24 nlunarose@azdisabilitylaw.org

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5/29/2019 19:08 pperlo@ix.netcom.com

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5/29/2019 19:39 timcjohnston@verizon.net

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ALL APPROVED VOTING SYSTEMS WILL

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5/29/2019 21:22 Margueritaj@gmail.com

the VVSG 2.0 Cybersecurity Working Group. It is essential that the VVSG 2.0 prohibits voting systems from using wireless and public telecommunications infrastructure. Network communication over public channels uses a chain of technologies which introduce dozens of vulnerable points, most beyond the control of election officials. Threats start with simple problems like misconfiguration and failure to update hardware and software promptly when new vulnerabilities are discovered. At the other end of the spectrum are attacks in which Stingrays/IMSI-catchers (cell-site simulators) hijack cellular communications and Border Gateway Protocol hijacking reroutes communication traffic through adversarial countries. Potential malicious activity includes denial of service, eavesdropping, data manipulation, data exfiltration, malware infection, and remote access. These are real and present threats that the VVSG must address. The EAC-certified components of a voting system should not communicate with each other through uncertified hardware and software. We would be putting significant trust in external systems that are not sufficiently trustworthy. I urge the EAC to include the following guideline under Principle 13 (Data Protection): "The voting

5/29/2019 21:28 kevin@kevinskoglund.com

someone who has worked in election integrity groups for years, locally as well as nationally, all I can say is that it is high time that elections be returned to the commons. The people should not be removed from the process. I have friends in Spain who have a community approach to voting that employees the people of the community to run elections as well as take part in the counting of ballots at each precinct. It's orderly and it's working. The computerized voting machines being foisted on American cities and towns are expensive for one and offer no transparency. Plus they are ALL run on proprietary software which means ONLY corporations know how are votes are being counted. How much more suspect could elections become with corporations having that much control over and access to our vote counting. Yikes. The voting machine vendors have too much control in our voting systems and offer no assurances of giving even the voting officials a peak at the software running the machines. I have seen first hand how easily someone can rig a voting machine and we now know that anything run on software is hackable, from within or from without (man in the middle attack) Let's be sensible to all these issues! I think that the new VVSG 2.0 is a significant Please protect the integrity of our elections. We the people must be able to vote for the person that we want to govern our nation without interference from foreign adversaries who want to put someone in office who is easily corrupted. Thank you in advance for protecting our

5/29/2019 21:33 Jacquelinejanecke@gmail

5/29/2019 22:52 joeyf511@aol.com

Voting Systems Guidelines 2.0. I am a Judge of Election in Pittsburgh, PA. By educational background, I hold a BS in Electrical & Computer Engineering, an MS in Computation, Organizations, & Society, and a PhD in Societal Computing, from Lafayette College and Carnegie Mellon University respectively. I have also served as an observer for some of the election security procedures in Allegheny County, PA, and done very well in a national hackathon contest regarding social impact of certain technology, with a focus on systems related to elections. I believe that having free, fair, and trustworthy elections is of utmost importance for the future of our democracy. I am also a member of VoteAllegheny, a small nonprofit of other individuals concerned with election integrity, though my comments are my own and were not developed in direct coordination with that organization. As an important background point, I would like to note that local officials in charge of selecting election equipment often look to EAC guidelines and requirements for setting standards regarding that equipment, and are not necessarily willing to raise the bar any higher to address issues that may be unique to local law or history, especially when receiving trips and other gifts from the vendors of a

5/29/2019 22:57 Ben.Towne+voting@ieee.org

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5/30/2019 1:28 lizwhitlock@earthlink.net

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5/30/2019 3:24 janusjet7@yahoo.com

COMMENT PERIOD ENDS How to make a comment to the Election Assistance Commission
The Election Assistance Commission is responsible for setting the Voluntary Voting System Guidelines that determine many factors in how we vote. They are currently approving the new guidelines called the VVSG 2.0. Although these guidelines are an improvement, they have serious omissions that will undermine their ability to guarantee that all votes are counted as cast. We ask that you send this letter, or your own version of it to the EAC by 4pm on 5/29/19.

- 1) Use this form - the link is case sensitive. <https://www.eac.gov/vvsg-form/>
- 2) Copy and paste this letter into the form and send it.
- 3) Send a copy to SMART Elections.us here: <https://smartelections.us/contact-us>

We will publish your letters. To the Election Assistance Commission: We welcome the new VVSG 2.0 as a significant improvement to the current voting system guidelines. However as drafted, the VVSG 2.0 provides inadequate security and will not be able to assure voters that their votes are being counted as cast. Additionally, the drafting process has been flawed because it is too reliant on the biased input of voting system vendors, who have not historically shown a commitment to election security. I ask that you

5/30/2019 8:19 ShiraASStein@gmail.com