

From: [Rothschild, Joel CAPT WHS/FVAP](mailto:Rothschild.Joel.CAPT.WHS/FVAP)
To: votingsystemguidelines@eac.gov
Cc: [Carey, Robert CIV WHS/FVAP](mailto:Carey.Robert.CIV.WHS/FVAP); [Leader, Susan CIV OSD/FVAP](mailto:Leader.Susan.CIV.OSD/FVAP)
Subject: UOCAVA Pilot Program Testing Requirements Comments
Date: 04/15/2010 03:30 PM
Attachments: FVAP Comments to EAC Pilot Guidelines.pdf

Dear Chairwoman Davidson:

In March 2010, the Election Assistance Commission issued proposed requirements for the testing of pilot voting systems to serve UOCAVA voters. I have reviewed the proposed requirements and do not feel they provide sufficiently robust guidelines to ensure adequate protection from the existing electronic threat environment or national level threats.

The testing of any Internet-based voting system should be open and involve multiple parties. This includes validation and verification by the vendors, federal cyber and intelligence experts and third-party testers. I strongly recommend that existing Internet-based voting systems be rigorously and openly tested instead of a 2010 system deployment.

Sincerely,

Joel Rothschild
Chief of Staff
Federal Voting Assistance Program
By Direction