History:	🔁 This message has been replied to.

Dear Sir/Madam

We have read with interest the latest draft of the Voluntary Voting Systems Guidelines and would offer the following comments for your consideration.

1.   General Remarks

We believe it is a retrograde step to remove all references to the need to use open standards for data exchanges. Just saying "use XML" will achieve nothing other than chaos and rework. You can exchange any data using XML but unless that data is in a consistent format and handled in a consistent way you will not achieve full interoperability which has to be the goal. We would urge you to re-instate the references to open data standards and also the guidance, or preferably stronger terminology, to use the OASIS EML standard.

Following on from the above point we would question how you can test something without knowing what the results should be? So if you have no idea what the data being used is, which from the current draft you obviously don't, then how can you set criteria for the expected results.

You are also missing the following categories from your test suites - voting recording, tallying and results reporting testing.   We would point you to EML v6.0, shortly to be approved as an OASIS standard and then submitted to ISO for approval, that contains templates for allowing US results and examples to be fully developed - so that testing can be performed and outputs compared to the expected XML.

2.   Specific Remarks
On pages 183 and 186 add "such as OASIS EML XML" at the end of the sentences mentioning XML.
On page B8, the version of EML mentioned is wrong it should be v5.0, but this reference should not be included anyway as EML is no longer included in this draft - but see our comment above

Regards
John Borras

Chair OASIS E&VS Technical Committee