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April 11, 2019

U.S. Election Assistance Commission
1335 East West Highway, Ste. 4300
Silver Spring, MD 20910

Re: ECO 01330 Verity EAC Cert Logo and PM Label

Dear Mr. Macias, and Mr. Lovato

At the request of Hart InterCivic, SLI is providing an assessment of ECO-01330, including supporting documentation provided by Hart InterCivic, to determine if this change is De Minimis, and no additional testing is required.

Summary Description:

Hart InterCivic is requesting the following changes to the Verity Touch Writer Duo for Verity Voting 2.3:

1. The EAC's *VVSG Certified logo* is added to labels 1005768, 1005726, and 1005830.
2. The second bullet on the *Recommended Preventative Maintenance Schedule* label is updated as shown below.
From: "*As needed – using only Hart cleaning kit, clean printer with Part P/N: 1005828*"
To: "*As needed – clean printer with Hart printhead and roller cleaning sheets only*"

Reference Documents:

- EAC 2005 Voluntary Voting System Guidelines (VVSG) Volume II, Sec. 1 & 4
- EAC Voting System Testing and Certification Program Manual V. 2, Sec. 3.4 & 3.5

Documentation used in SLI's Assessment:

- ECO-01330 Summary - Verity EAC Cert Logo and PM Label update 4005647 A00
- BOM
- Drawings

Conclusion:

Item #1 will allow election officials to easily identify the voting device as being VVSG (2005 ver.) EAC certified.

Item #2 will help clarify cleaning materials needed.

SLI has assessed the changes in ECO-01330 including supporting documentation. The requested changes do not affect the system's reliability, functionality, capability, operation or software. SLI considers the nature of this change to be De Minimis, and therefore does not affect the Federal certification status of Verity Voting 2.3. No testing is required.

As required under section 3.4.3 of the EAC's Voting System Testing and Certification Program Manual Version 2.0, Hart InterCivic has provided the necessary information to verify the ECO 01330 change is De Minimis.

Please refer to the attached SLI Engineering Change Evaluation and Review Form.

If you have questions regarding this assessment, please contact Jon Panek.

Sincerely,

A handwritten signature in blue ink, appearing to read "Traci Mapps".

Traci Mapps
Director of Operations