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February 19, 2015

The Honorable Thomas Hicks, Commissioner
United States Election Assistance Commission
1335 East West Highway, Suite 4300
Silver Spring, MD 20910

Dear Commissioner Hicks:

Congratulations to you and your colleagues on confirmation as a Commissioner on the Election Assistance Commission (EAC). The ACM U.S. Public Policy Council is encouraged to see the EAC return to action and remains ready to provide technical advice on electronic voting and other election procedures as needed.

ABOUT ACM AND USACM

With over 100,000 members, the Association for Computing Machinery (ACM) is the world's oldest and largest educational and scientific computing society. The ACM U.S. Public Policy Council (USACM) serves as the focal point for ACM's interaction with U.S. government organizations, the computing community, and the U.S. public in all matters of U.S. public policy related to information technology. Our comments are informed by the research experience of our membership. Should you have any questions or need additional information, please contact our Public Policy Office at 212-626-0541 or at acmpo@hq.acm.org.

TECHNICAL ADVICE AT THE EAC

We read with interest the letters sent to you and your colleagues by Ben Ginsberg and Bob Bauer, the co-chairs of the Presidential Commission on Election Administration. We endorse the recommendations in their letters:

- The EAC should publicly discuss, consider and adopt the pending Draft Voluntary Voting System Guidelines Version 1.1 shortly after the EAC establishes a quorum.
- The EAC should adopt the Voting System Testing and Certification Program Manual Version 2.0.
- The EAC should adopt the Voting System Test Laboratory Program Manual Version 2.0.

A robust voting system standards process is important to elections; these recommendations will help establish such a process.

The EAC should also reactivate its technical advisory committee. The Technical Guidelines Development Committee (TGDC) has been inactive since early 2012. The group provides valuable elections advice and would be helpful as the Commission resumes normal operations.

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STANDARDS FOR ONLINE DELIVERY OF BLANK BALLOTS AND REGISTRATION FORMS AND POSSIBLY FOR ONLINE BALLOT MARKING

States have been exploring alternatives to in-person or by-mail voting, including online delivery and submission of voter registration forms and ballots. The EAC can and should establish standards for online delivery of blank registration forms and ballots and possibly the online return of completed registration forms. Establishing standards in this area can help prevent mishaps and delays.

We respectfully request that the EAC consider these recommendations and take steps to resume the EAC's function in updating and facilitating the voting system standards and certification process. We are ready to provide our expertise to the Commission as it performs its important work in modernizing our voting systems.

Sincerely,

Eugene H. Spafford, Ph.D.   Juan E. Gilbert, Ph.D.
Chair   Chair, Voting Committee
U.S. Public Policy Council   U.S. Public Policy Council
Association for Computing Machinery Association for Computing Machinery

cc: Commissioner Matthew Masterson
        Commissioner Christy McCormick