

Association for Computing Machinery (ACM) ACM US Public Policy Council (USACM)

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National Institute of Standards and Technology 100 Bureau Drive Gaithersburg, MD 20899 Center for Civic Design 78 Washington Avenue High Bridge, NJ 08829

Dear NIST and the Center for Civic Design:

Thank you for the opportunity to comment on the Roadmap for Future Usability and Accessibility Guidance for future election systems. We applaud your proactive leadership in gathering input from the wide range of public and private stakeholders at the state and federal levels, convening the stakeholders at workshops, and capturing the diverse feedback in this well-organized Roadmap.

ACM, the Association for Computing Machinery, is the world's largest educational and scientific computing society. The ACM U.S. Public Policy Council (USACM) serves as the focal point for ACM's interactions with the U.S. government on public policy issues. USACM includes members with expertise in accessible voting technologies, usability, and voting systems generally.

The Roadmap is a thoughtful approach to meeting the challenges of ensuring usable and accessible voting technologies and systems. The framework represents a positive and achievable plan for working toward inclusive participation of all voters in elections and improved accessible, usable, and accountable systems throughout the election process. Its outline of issues, gaps, and areas of recommended action provides a starting point for future efforts to improve and ensure the right of all voters to cast their votes independently and privately using secure, reliable, usable, and trustworthy computer-based systems.

We agree with the Roadmap that "voting standards have complex requirements." Voting system design requires the integration of many elements, including privacy, security, reliability, auditing, usability, and accessibility. It is essential that NIST specify common performance standards and system testing and reporting frameworks, and that they be broadly adopted.

We appreciate the recognition of ACM SIGCHI (Special Interest Group on Computer-Human Interaction) in the Roadmap as a professional resource for efforts related to human factors.

Thank you again for developing this Roadmap. Your ongoing efforts to support collaborative discussions and promote common understanding are essential to meet the challenges of sustaining democracy.

We look forward to engaging with NIST and the other stakeholders as the discussions and efforts continue.

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If you have any questions, please contact the ACM Public Policy Office at 212-626-0541 or by email at acmpo@acm.org.

Sincerely,

Eugene H. Spafford, Ph.D. Chair, U.S. Public Policy Council Association for Computing Machinery