



EAC Decision on Request for Interpretation 2007-03, 2005 VVSG Vol. 1 Section 3.1.1

Date:

September 5, 2007

Question:

Does Vol. 1 Section 3.1.1 of the 2005 VVSG require the manufacturer to submit the summative usability testing report to the VSTL conducting the testing of the voting system or to the EAC?

Facts:

The 2005 VVSG requires all manufacturers to conduct summative usability testing in order to ensure that the voting system meets the usability requirements of the 2005 VVSG. Currently it is the practice of the manufacturers to submit the usability test report as part of the technical data package submitted to the EAC, which is consistent with the stated requirement of the 2005 VVSG. The VSTL does not currently receive the usability test report and is only responsible for checking to make sure the usability testing was conducted.

Section of Standards or Guidelines:

Section 3.1.1 of the 2005 VVSG Vol. 1 reads:

The vendor shall conduct summative usability tests on the voting system using individuals representative of the general population. The vendor shall document the testing performed and report the test results using the Common Industry Format. This documentation shall be included in the Technical Data Package submitted to the EAC for national certification.

Conclusion:

The EAC concludes that manufacturers must submit the summative usability test report required by Section 3.1.1 of the 2005 VVSG Vol. 1 to the VSTL for review. In addition,

the usability test report shall be submitted to the EAC as part of the documentation manufacturers are required to file with the application to test a voting system. This interpretation is consistent with the intent of the requirement which was to ensure that the voting system meets the usability requirements of the 2005 VVSG. Consistent with the 2005 VVSG the manufacturer must submit the usability test report to the VSTL as part of the technical data package submitted to the laboratory. The VSTL will then check the technical data package to ensure that the report is present and reported in the common industry format. If the VSTL finds the usability test report to be inconsistent with the common industry format the VSTL shall note the discrepancy in its final report to the EAC.