

Grandfathering: A Testing Laboratory Perspective

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Past Standards

- Federal Election Commission, Performance in Test Standards for Punchcard, Marksense and Direct Recording Electronic Voting Systems - written in 1990, implemented over a period of several years
- 2002 Voting System Standards, published in April, grandfathered to January 2005
- European Norm Standards, generally have 2-3 year grandfathering
- Military Standards, always grandfather based on applicable revision when equipment was built

Impact of Not Grandfathering

- Standard is not available today
- Testing Laboratories have not been able to train on new standard requirements
- Vendors are not all aware of new requirements and how to implement them
- Compliance Checklists are not prepared, reviewed and available for use (guides the certification process)
- Not all issues have been resolved in Voluntary Voting Systems Guidelines (VVSG) 2005; i.e implementation of VVPAT



Issues (continued)

- VVSG 2005 contains many new requirements (i.e Section 508 and ADA issues) which have not been evaluated before and need processes.
- With no grandfathering, no qualified systems exist.
- With no qualified systems can HAVA funding be used?
- With no systems built to new standards, testing laboratories will see a lull and a corresponding surge in demand. We may not have the capacity to keep up with demand.
- Bottom Line: We are not ready to implement VVSG 2005 today. May need 3-6 months.

Benefits of Grandfathering

- Provides time to train in new requirements
- Provides time to prepare, review and approve certification checklists
- Provides time for vendors to learn and design new systems
- Vendors will have time to design all changes at the same time. Otherwise, we will see a piecemeal approach with potential incompatibility issues. This will force re-testing.
- Consistent with past practices and other standards

Detriments to Grandfathering

- Slows the implementation of VSS 2005. Won't be used extensively in 2006 election cycle. Some of the technology is ready.
- Systems non-compliant with HAVA will need to be fielded. (Will HAVA funds be used for these systems?). Which standard do we use?
- Issues like VVPAT will remain unsolved and untested if implementation delayed or grandfathered.
- Vendors and laboratories not challenged to develop the newer technology until it is a requirement

Current Testing Status

- Wyle completed 3 systems to 2002 VSS in last few weeks
- Wyle has 4 systems currently in various areas of the certification process using 2002 VSS requirements
- Wyle has had several requirements for new certifications to 2002 VSS (approx. 6)
- Some vendors looking to block several months at a time which limits capacity for others



Thank You For Your Time

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