July 10, 2009

The Honorable Rush Holt
United States House of Representatives
1214 Longworth Building
Washington, DC 20515

Dear Representative Holt:

On behalf of the U.S. Public Policy Council of the Association for Computing Machinery (USACM), we wish to thank you for the opportunity to review and comment on the Voter Confidence and Increased Accessibility Act of 2009. The Association for Computing Machinery (ACM) – the leading society for computing professionals – and USACM are committed to educating the public and policymakers about technical issues associated with electronic voting.

We appreciate your continued attention to issues of increased voter confidence and accessibility. Your initiative resonates with USACM's positions on electronic voting — that accurate, honest elections are one of the foundations of our democracy. We want to ensure support for the development and deployment of trustworthy voting systems, and this bill can help accomplish this goal.

USACM supports the provisions of the bill requiring that voters have an independent means of verifying their votes. Paper-based audit trails are currently the only transparent means for voting systems to be auditable independent of the underlying software. The approach taken for independent verification in this legislation has both important similarities with, and differences from, the proposed Voluntary Voting System Guidelines (VVSG) 2.0 currently being considered by the Election Assistance Commission. In particular, the VVSG 2.0 approach for independent voter verification is by way of a Software Independence[1] standard. It also specifically states that independent voter-verifiable paper records meet that standard. This approach is similar to the one in the proposed legislation.

Unlike the proposed legislation, the VVSG 2.0 anticipates that other approaches might achieve the SI standard in the future and describes a procedure for approving systems as an "Innovation Class." To encourage both the integrity of elections and future innovation in voting systems, USACM supported both the Software Independence standard and the Innovation Class. We recommend that this legislation include an approach similar to the Innovation Class.

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[1] Software Independence is defined in section 2.7 of the proposed VVSG 2.0; however, USACM proposed an amended definition, which is on page 13 of our comments submitted to the Commission (http://usacm.acm.org/PDF/USACM_VVSG_Comments_Final.pdf): Voting systems shall be software independent, that is, an error or fault in the voting system's software shall not be capable of causing an undetectable change in election results, even if the software fault(s) are not detected.

This legislation can help strengthen the voting system in the United States. We hope that you will be able to incorporate our recommendations as the legislation moves through the legislative process. Thank you for your continued involvement. We are pleased to continue to work with you and should you have any questions, please contact Cameron Wilson, ACM's Director of Public Policy at 202-659-9711.

Sincerely,

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

cc: Representative Robert Brady, Chair, Committee on House Administration
       Representative Dan Lungren, Ranking Member, Committee on House Administration

ABOUT ACM

ACM, the Association for Computing Machinery www.acm.org, is the world's largest educational and scientific computing society, uniting computing educators, researchers and professionals to inspire dialogue, share resources and address the field's challenges. ACM strengthens the computing profession's collective voice through strong leadership, promotion of the highest standards, and recognition of technical excellence. ACM supports the professional growth of its members by providing opportunities for life-long learning, career development, and professional networking.

ABOUT USACM

The ACM U.S. Public Policy Council (USACM) http://www.acm.org/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. Supported by ACM's Washington, D.C., Office of Public Policy, USACM responds to requests for information and technical expertise from U.S. government agencies and departments, seeks to influence relevant U.S. government policies on behalf of the computing community and the public, and provides information to ACM on relevant U.S. government activities. USACM also identifies potentially significant technical and public policy issues and brings them to the attention of ACM and the community.