



March 29, 2007

Secretary Debra Bowen
California Secretary of State
1500 11th Street
Sacramento, California 95814
ATTN: Voting Systems Review, 6th Floor

Dear Secretary Bowen:

The California State Association of Counties (CSAC) and the Regional Council of Rural Counties (RCRC) wish to respond to your request for public comments on the Draft Criteria for a Top-to-Bottom Review of Electronic Voting Systems released by your office on March 22, 2007.

As representatives of California's 58 counties, our organizations have significant concerns with the Draft Criteria as written. California's counties currently employ a variety of voting systems, all of which have passed comprehensive federal testing standards as well as California's more rigorous thresholds for security, accuracy, and reliability. A complete review and possible decertification of voting systems at this critical juncture in the electoral process, with the newly created Presidential Primary election a mere ten months away, will cause untold disruption for counties, the state of California, and most importantly, registered voters. In fact, it seems the Draft Criteria do not take into account that independent testing and monitoring of last fall's November election resulted in a 100 percent accuracy rating for more than eight million votes cast throughout the Golden State.

Furthermore, any voting systems review must include precise and reasonable standards, as well as clear and measurable objectives. The Draft Criteria as currently written do not meet any of these basic provisions; and thereby will not only jeopardize the integrity of voting systems, but also threaten to unnecessarily erode voter confidence.

Lastly, the Draft Criteria do not contain any mention of funding for the administration of the review, nor for any remedy that the review might recommend. Counties must have an adequate source of new funding to reasonably comply with any review of voting systems or potential changes in requirements.

Despite these concerns, counties stand ready to assist you in developing review standards in the interest of completing a comprehensive, orderly, and timely review of voting systems in use in California. We all wish to meet our common goal of fair, accurate, and accessible elections, and thereby appreciate the opportunity to submit these comments.

Sincerely,

Karen Keene
Legislative Representative
CSAC

Paul Smith
Director of Legislative Affairs
RCRC