



DEBRA BOWEN | SECRETARY OF STATE | STATE OF CALIFORNIA
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September 10, 2007

Travis E. Harrell
Product Manager, Voting Systems
Hart InterCivic, Inc.
15500 Wells Port Drive
Austin, TX 78728

Dear Mr. Harrell:

We have reviewed your request dated July 11, 2007, requesting administrative approval from the Secretary of State for proposed modifications to the Hart InterCivic System 6.2.1 voting system currently certified for use in California. Specifically, you have requested approval for modifications to the VBO cable retention clip to ensure proper connection between the VBO and its mounting, thereby increasing the durability and reliability of the VBO. These modifications entail:

1. The use of a stronger double-sided adhesive strip material when installing or replacing the clip; and
2. The addition of two nylon rivets to further strengthen the mounting of the cable clip to the VBO.

In consideration of your request, Secretary of State OVSTA staff has reviewed the technical documentation of this modification, as well as the enhanced version of the clip that you have provided. Further, we have received a copy of the July 23, 2007, letter from SysTest Labs, an Elections Assistance Commission (EAC) accredited Voting Systems Testing Laboratory (VSTL), concluding that:

“SysTest Labs has reviewed the VBO cable retention clip enhancement with reference to the 2002 VSS standards and the NASED approval process under which Hart’s System 6.2.1 and earlier systems were certified. This change meets all requirements and requires no additional testing.”

Based on the review of this information, OVSTA staff has determined that this modification is of such limited scope that it does not require further examination and testing. Further, due to the improved reliability of the Hart VBO devices so modified, OVSTA staff believes this proposed modification should be implemented on all Hart VBO devices.

Therefore, in accordance with Section 19213 of the California Elections Code, Hart InterCivic is approved to implement the proposed modification to the VBO version 1.8.3

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retention clip as described in your letter of request dated July 11, 2007, and the supporting documentation submitted with that letter.

If you have any questions or concerns regarding the approval please do not hesitate to contact me personally at (916) 653-7244 or lfinley@sos.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Lowell Finley". The signature is stylized with a large, sweeping flourish at the end.

Lowell Finley
Deputy Secretary of State
Voting Systems Technology and Policy