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From: ███████████
Sent: Tuesday, March 27, 2007 12:18 PM
To: Voting Systems
Cc: Elections - El Dorado County
Subject: Fwd: COMMENTS ON PROPOSED GUIDELINES

-----Original Message-----
From: ███████████
To: ███████████
Sent: Sat, 24 Mar 2007 4:50 PM
Subject: Fw: COMMENTS ON PROPOSED GUIDELINES

----- Original Message -----
From: Kevin Chung
To: elections@sos.ca.gov
Sent: Saturday, March 24, 2007 16:46
Subject: Fw: COMMENTS ON PROPOSED GUIDELINES

----- Original Message -----
From: Kevin Chung
To: votingsystems@sos.ca.gov
Sent: Saturday, March 24, 2007 16:15
Subject: COMMENTS ON PROPOSED GUIDELINES

Your honorable Secretary of State:

The proposed standards are great in general. AVANTE is a vendor that have tried to have its systems certified previously. The following are some of the specifics that we think should be included.

1. For the DRE with VVPB or VVPAT as currently required in CA election codes:
   o All DRE should not be allowed to use easily changeable medium such as Flash or other read/write medium for transfering ballot images, tallies and event log. It should be WRITE-ONCE-READ-MANY media (e.g. CD-R or DVD) only.
   o Each of the paper records should have a one-to-one correspondence with the electronic ballot images. This is part of the requirements of 2005 VVSG. The significance have been illustrated in the election in OHIO in 2006 where 10% of the paper records are either "not printed" or damaged. Without one-to-one linkage between electronic ballot images and paper records will mean that the rest of the 90% cannot be authenticated. On the otherhand, if there were a one-to-one correlation like the EAC 2005 VVSG required and "by-passed" by California certification experts, the remaining 90% can be individually verified against the electronic votes and thus render the rest of 10% not printed ballots with statistically valid and trustworthy results.
2. Since more than 50% voters voted on absentee ballots and yet none of the ballot can really be authenticated by themselves, there are rooms of vulnerabilities. AVANTE recommends the following for paper ballot systems:
   o Each of the paper ballots should have a machine-readable unique and random identifier that can allow for FULL AUTHENTICATION. The privacy concern is not really valid as "NO FAULT" and "PERMANENT ABSENTEE" voting is already in place. Voters can "sell" or "being coerced" their

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votes in the privacy of their home easily already.
- o All Precint-based voting system and absentee optical system should capture the ballot images as "pictures". This capability will prevent any subsequent tampering or vulnerabilities.

We have attached the following white papers for your considerations.

http://www.vote-trakker.com/White%20Papers/PAPER%20BALLOTS%20WITH%20OPTICAL%20ELECTRONIC%20SCANNING%20VS%20ELECTRONIC%20BALLOT%20WITH%20VOTER%20VERIFIED%20PAPER%20BALLOT.pdf

Regards,

Kevin Chung, Ph.D.
CEO, AVANTE International Technology, Inc.

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