



August 24, 2021

Waldeep Singh
Dominion Voting Systems Inc.
1201 18th Street, Suite 210
Denver, Colorado, 80202

Dear Mr. Singh,

On Wednesday, June 23, 2021, the California Secretary of State Office of Voting Systems Technology Assessment (OVSTA) received an application for Administrative Approval pursuant to California Elections Code section 19216 for nine modifications to the Democracy Suite 5.10A voting system. The nine modifications are to replace end-of-life hardware and adjust a resistor to increase production yield. The nine modifications do not require changes to the Democracy Suite 5.10A software or operating systems. The nine modifications requested are the following:

1. ECO 100706 Adjusted resistor value on the ImageCast Precinct 2 Paper Sensor Board. The 220-ohm resistors used to regulate the sensor light output were replaced with 180-ohm resistors to increase the light output due to some sensor LEDs not producing the required light output during manufacturing testing and thereby decreasing production yields. Adjusting the resistor value brings the LED light output within required parameters across the production lot.
2. ECO 100719 Added DELL Precision 3440 XE computer as an EMS and adjudication (ADJ) client workstation configuration due to the DELL Precision T3420, 3430, and 3431 computers becoming commercially unavailable for purchase.
3. ECO 100720 Added DELL Precision 3440 XE computer as an ImageCast Central (ICC) Canon Scanner workstation configuration due to the DELL OptiPlex 3050 and 5270 computers becoming commercially unavailable for purchase.
4. ECO 100721 Added DELL OptiPlex XE3 computer as an ImageCast Central HiPro Scanner workstation configuration due to the DELL OptiPlex 7050, 7060, and 7070 computers becoming commercially unavailable for purchase.
5. ECO 100741 Added DELL Latitude laptop computer as an ImageCast Voter Activation client workstation configuration due to the DELL Latitude 3400 laptop computer becoming commercially unavailable for purchase.
6. ECO 100742 Added DELL Latitude 3410 laptop computer as a Mobile Ballot Production (BMD) client workstation configuration due to the DELL Latitude 3400 laptop computer becoming commercially unavailable for purchase.

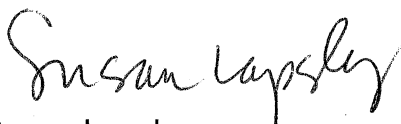
7. ECO 100755 Added Cisco 24-port Ethernet Switch (CBS350-24T-4G) due to the DELL x1026 Ethernet Switch becoming commercially unavailable for purchase.
8. ECO 100760 Added Apacer 8GB (EH353-M APHA008GAG0CG-3TM) and 16GB (EH353-M APHA016GAG0CG-3TM) USB memory devices to provide an alternate supplier for these memory devices. The Apacer memory devices are to be used on the ImageCast X (ICX) and ImageCast Central devices.
9. ECO 100761 Added CyberPower PR1500LCD and PR1500LCD-VTVM UPS as a battery backup option for use with the ICX Prime BMD configuration as an alternate source (AVL).

California Elections Code section 19216 precludes a voting system or part of a voting system that has been approved by the Secretary of State from being changed or modified until the Secretary of State has determined the change "does not impair its accuracy and efficiency...."

If the Secretary of State determines the change or modification does not impair the accuracy or efficiency of the voting system, the Secretary of State may administratively approve the proposed change or modification.

With your request, you submitted an Election Assistance Commission (EAC) certified Voting System Testing Laboratory (VSTL) analysis from Pro V&V for each of the above-described modifications. The documentation submitted from Pro V&V found each modification to be De Minimus, with no additional testing required. You also submitted supporting documentation and product specification sheets for each ECO, as well as EAC approvals for ECOs 100706, 100719, 100720, 100721, and 100741.

Based on the application, product specification sheets, an analysis of the EAC approvals, and findings from Pro V&V that the changes are De Minimus, this administrative approval is granted. All other conditions of the Democracy Suite 5.10A certification, dated October 18, 2019, remain in effect.



Susan Lapsley
Deputy Secretary of State, HAVA & Counsel