



June 22, 2020

Submitted Electronically

Chairwoman Christy McCormick  
U.S. Election Assistance Commission  
1335 East-West Highway, Suite 4300  
Silver Spring, Maryland 20910

Re: Comments on Voluntary Voting System Guidelines 2.0 (EAC-2020-0002-0001)

Dear Chairwoman McCormick:

The Association for Computing Machinery (“ACM”) is the longest established and, with more than 100,000 global members, the largest association of individual professionals engaged in all aspects of computing in the world. A non-lobbying and otherwise wholly apolitical organization, ACM’s mission includes providing unbiased, expert technical advice to policymakers on matters of our members’ wide-ranging expertise. That work is accomplished in the United States by and through ACM’s U.S. Technology Policy Committee (USTPC).

The Committee commends the Commission for its conduct of this proceeding to further refine and finalize Version 2.0 of its Voluntary Voting System Guidelines (“VVSG 2.0”) and is pleased to again contribute to that process.<sup>1</sup> We write today to urge the Commission in the final version of the Guidelines to:

- **Maintain, without weakening, important existing language** intended to assure that all voting technology must be:
  - **isolatable** from inherently vulnerable networks of all kinds;
  - **inspectable** with very high confidence at every stage of operation; and
  - **interoperable** to maximize efficiency and system modernity.
- **Add critical new provisions to VVSG 2.0:**
  - “sunsetting” all earlier versions of the guidelines on a near-term date certain;
  - requiring vendors to certify that all voting systems fully comply with VVSG 2.0, rather than any earlier standard; and
  - sharply defining what constitutes a “new system,” versus a system “modification”;
  - clarifying that the Commission, not vendors, will make that determination; and
  - stating specifically and categorically that the use of “recallable” ballots cannot be reconciled with acceptable standards of election security and public trust.

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<sup>1</sup> USTPC last [commented in this proceeding](#) on May 29, 2019.

USTPC looks forward to assessing the comments of other parties in this proceeding and, having done so, to potentially providing the Commission with further input as may be appropriate. In the interim, thank you again for the opportunity to participate in this crucial effort.

Should you or your staff have any questions regarding these Comments, or seek further expert analysis or information our members may provide, please email Adam Eisgrau, ACM's Washington-based Director of Global Policy & Public Affairs, at the address below or reach him at 202-580-6555.

Sincerely,

A handwritten signature in black ink, appearing to read "James A. Hendler", with a long horizontal flourish extending to the right.

James A. Hendler, Chair