

October 16, 2019

To the Members of the VVSG Technical Guidelines Development Committee,

It's come to our attention that the 50,000+ comments submitted from different bipartisan allies calling for a ban on wireless modems and internet connectivity in voting machines have not been made available to you.

Attached are the unique comments that were shared with EAC staff. [Here is the press release about the bipartisan comment effort in May 2019.](#)

The file of all 45,550 comments that our coalition collected, including both unique and standard comments together, is quite large. We would be happy to share it on request. Common Cause collected around 6,000 comments and mailed theirs in separately by the June 2019 deadline. There were of course many comments submitted outside of our bipartisan coalition, which I also hope will be provided by the EAC staff.

We understand that you've already discussed this issue without having access to the comments, but we hope that you will reconsider a ban on wireless and all Internet connectivity in ballot marking and vote tabulating machines and systems that interact with them. (p. 258, 343 [Verbatim of Sept. 19-20 meeting](#))

This is the standard comment that many people submitted. We believe it's worth knowing how broadly a ban on wireless in voting systems was supported:

I strongly support the draft Voluntary Voting System Guidelines (VVSG) and commend the robust principles and guidelines for software independence, auditability and ballot secrecy.

Given the fact that our election systems are being targeted for interference through cyberattacks, it is imperative the VVSG also prohibit connectivity to the public Internet through wireless modems or other means.

We want to ban modems in vote counting machines both to protect data and to prevent manipulation.

Therefore, we urge the Commission to add the following to the guideline under Principle 13:

DATA PROTECTION:

"The voting system does not use wireless technology or connect to any public telecommunications infrastructure."

Indeed, eliminating wireless modems and internet connectivity will not guarantee our voting machines can't be manipulated or hacked through corrupted USB sticks, insider attacks or supply chain corruption. That is why ultimately all votes should be cast on paper ballots and all elections should be audited by manually counting a sample of the paper ballots, but this guideline is essential while we still use voting machines.

Thank you for your consideration of this update to the latest set of guidelines.

Our letter to the EAC with original submission of comments is below. We received confirmation of their receipt by the EAC by email, and subsequently sent 1,466 unique comments electronically to the EAC staff at their request. We are now sharing these same comments with you.

Sincerely,

Public Citizen
Secure Elections Network
SMART Elections

To: U.S. Election Assistance Commission
1335 East West Highway, Suite 4300
Silver Spring, MD 20910
From: Aquene Freechild
Secure Our Vote Coalition & Public Citizen
c/o 1600 20th St. NW
Washington, DC 20009

Re: Comments on the VVSG 2.0 Principles and Guidelines

Dear Chair Christine McCormick, Vice-Chair Benjamin Hovland, Commissioner Thomas Hicks, Commissioner Donald Palmer and the staff of Elections Assistance Commission (EAC),

Please find contained in this package individual comments received by the Secure Our Vote Coalition, DailyKos and Public Citizen. These comments are in support of passage of stronger VVSG 2.0 Principles and Guidelines that make clear that voting systems with wireless capability are not secure and should not be certifiable.

These comments were submitted directly to the email address provided by the EAC on the Federal Register as well.

The comments in this package number approximately 45,550 individual comments in support of banning wireless from VVSG certified voting equipment.

About 3,300 comments came from Public Citizen supporters, 8,450 came from People for the American Way supporters. Over 32,850 of the comments came from individuals who found the action through the Secure Our Vote Coalition, Twitter, Facebook and DailyKos.

We will provide an electronic file with the comments as well to make it easier for you to process the unique comments.

Thank you for your consideration.

Sincerely,

Aquene Freechild
On behalf of the Secure Our Vote Coalition & Public Citizen