



September 30, 2005

National Institute of Standards and Technology
Gaithersburg, MD

Re: Developing an Analysis of Threats to Voting Systems

We are writing on behalf of the members of the Information Technology Association of America's Election Technology Council in response to your call to the elections community for submission of threat analysis papers and for participation in NIST's upcoming workshop: "Developing an Analysis of Threats to Voting Systems."

The Election Technology Council (ETC) is a group of companies that offer products and services which support the electoral process and have decided to work together to address common issues facing the industry. Members of the ETC currently operating in the voting systems business are: Advanced Voting Systems, Danaher Guardian Voting Systems Diebold Election Systems, Election Systems & Software, Hart InterCivic, Perfect Voting System, Sequoia Voting Systems, UniLect Corporation and VoteHere.

Our member companies applaud NIST's work in driving the development of the Voluntary Voting Systems Guidelines and its array of meetings, workshops, and papers designed to facilitate the evolution and improvement of voting systems standards, infrastructure, and processes serving America's voters. In fact these member companies have all been participants in this process of creation and development of new voting system guidelines.

While every member of the ETC has a strong interest in working to promote voting systems security, the ETC group serves as an advocate and representative for a wide array of companies with a huge assortment of products and services offered in the marketplace. We recognize that identifying, describing, and cataloguing every realistic threat to those systems and services will be an immense undertaking. ITAA and our ETC member companies will support this effort to the best of our abilities. You will see many of the member companies' representatives at this meeting, in which each may provide direct input or participate. However, at this early stage, it is impossible for us to provide meaningful comments as a group. We will offer an ETC group response after the meeting when we have a sense of the issues and breadth of scope that the security threat analysis project will include.

In developing a framework for this project, we would respectfully request that NIST and the voting community look to the guidance of the Help America Vote Act (HAVA) of 2002, which recognized **both** process and infrastructure shortcomings in the American election system.

Information Technology Association of America
1401 Wilson Blvd. - Suite 1100, Arlington, Virginia 22209-2318 ■ Phone: (703) 522-5055 Fax: (703) 525-2279

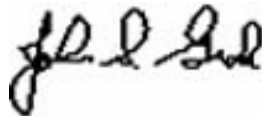
Threats to voting system security are not confined solely to electronic or software-based systems. The physical act of casting a vote on a voting station is just one facet of a much larger and more complicated process. Also, the history of voting in America is replete with examples of attacks, fraud, and tampering committed on paper-based systems. We believe that a comprehensive view of voting systems and the processes in which they are used is a prudent approach.

Again, our members look forward to working with NIST as the process of identifying, describing, and cataloguing threats to voting systems goes forward. We ask only that this effort provide a comprehensive view of the entire array of systems and processes that make up this country's election system. In the end, we believe that such an approach will yield a more valuable and useful work product that should instill even greater levels of confidence in America's elections.

Sincerely,



Harris N. Miller
ITAA President



John S. Groh
Chair, ITAA Election Technology
Council