I appreciate an opportunity to participate in this important discussion. I want to briefly comment on 3 considerations from our POV at the TrustTheVote Project.

1. Certification
For SB.360 to succeed, we believe any effort to create a high-integrity certification process requires re-thinking how certification has been done to this point. Currently, federal certification takes a monolithic approach; that is, a voting system is certified based on a complete all-inclusive single closed system model. This is a very 20th century approach that makes assumptions about software, hardware, and systems that are out of touch with today’s dynamic technology environment, where the lifetime of commodity hardware is months. We are collaborating with NIST on a way to update this outdated model with a componentized approach; that is, a unit-level testing method, such that if a component needs to be changed, the only recertification required would be of that discrete element, and not the entire system. There are enormous potential benefits including lowering costs, speeding certification, and removing a bar to innovation. I’m glad to talk off line about this proposed updated certification model. But elections officials should note that in order to reap the benefits of SB.360, a new certification process, componentized as I describe it, is essential.

2. Standards
2nd, there is a prerequisite for component-level certification that until recently wasn’t available: common open data format standards that enable components to communicate with one another; for example, a format for a ballot-counter’s output of vote tally data, that also serves as input to a tabulator component. Without common data formats elections officials have to acquire a whole integrated product suite that communicates in a proprietary manner. With common data formats, you can mix and match; and perhaps more importantly, incrementally replace units over time, rather than doing what I like to refer to as forklift upgrades or fleet replacements. The good news is the scope for ballot casting and counting is sufficiently focused to avoid distraction from the many other standards elements of the entire elections ecosystem. And there
is more goodness because standards bodies are working on this right now, with participation by several state and local election officials, as well as vendors present today, and non-profit projects like TrustTheVote. They deserve congratulations for reaching this imperative state of data standards détente. It’s not finished, but the effort and momentum is there. So, elections officials should bear in mind that benefits of SB.360 also rest on the existence of common open elections data standards.

3. Commercial Revitalization

Finally, this is the opportunity to realize a dream that open data standards, a new certification process, and lowered bars to innovation through open sourcing, will reinvigorate a stagnant voting technology industry. Because the passage of SB.360 can fortify these three developments, there can and should be renewed commercial enthusiasm for innovation. Such should bring about new vendors, new solutions, and new empowerment of elections officials themselves to choose how they want to raise their voting systems to a higher grade of performance, reliability, fault tolerance, and integrity. One compelling example is the potential for commodity commercial off-the-shelf hardware to fully meet the needs of voting and elections machinery. To that point, let us offer an important clarification and dispel a misconception about rolling your own. This does not mean that elections officials are about to be left to self-vend. And by that we mean self-construct and support their open, standard, commodity voting system components. A few jurisdictions may consider it, but in the vast majority of cases, the Foundation forecasts that this will simply introduce more choice rather than forcing you to become a do-it-yourself type. Some may choose to contract with a systems integrator to deploy a new system integrating commodity hardware and open source software. Others may choose vendors who offer out-of-the-box open source solutions in pre-packaged hardware. Choice is good: it’s an awesome self-correcting market regulator and it ensures opportunity for innovation. To the latter point, we believe initiatives underway like STAR in Travis County, and the TrustTheVote Project will catalyze that innovation in an open source manner, thereby lowering costs, improving transparency, and ultimately improving the quality of what we consider critical democracy infrastructure.

SB.360 can help inject new vitality in voting systems technology, so long as we can realize the benefits of open standards and drive the modernization of certification.