HART *intercivic*

October 27, 2017

The Honorable Ron Wyden
United States Senate
221 Dirksen Senate Office Building
Washington, DC 20510

Dear Senator Wyden,

Thank you for your letter seeking input and information regarding the security of the election infrastructure in the United States. Like you, Hart InterCivic is wholly dedicated to one of the most important privileges in our democratic society by supporting the sanctity of the vote and the public's confidence in the process and outcome.

Hart InterCivic's focus on technology, accessibility, accuracy, and security has kept us in the forefront of a changing world since 1912. Hart has been in the elections business for over 100 years and has always focused on bringing the best solutions and best service to our customers. During that time, we have worked with hundreds of customers, who have run thousands of successful elections and who have accurately tabulated tens of millions of votes.

This focus has resulted in exceptional business growth and the highest levels of customer satisfaction and loyalty in our industry. While we are pleased with these results, we are never satisfied. We continue to work hard to listen to Election Officials across the country and use what we learn to bring the best (most advanced, most secure, most flexible, most usable, highest value) solutions to market and deliver best-in-class customer service and support.

Hart provides a breadth of product options for our customers, allowing them to utilize whichever voting method they prefer. These options include paper, electronic, and electronic with paper audit trail in-person options as well as by-mail/central count options. All these products support secure, transparent, and accessible elections. Decisions about voting methods are the made by state and local government officials.

All voting systems are required to meet strict certification requirements before they may be used in an election. Federal certification requirements and testing protocols are defined and overseen by the Election Assistance Commission (EAC), which is overseen by Senate Rules and Administration Committee and the Committee on House Administration. EAC voting system certification requirements apply nationwide. In addition, most states have their own separate certification and testing requirements which frequently go beyond the federal requirements. At both the federal and state levels, systems are submitted to independent, accredited third-party testing labs which perform all testing and report results to the government certification authorities. Systems must meet or exceed all requirements before they are certified for use.

Election security goes beyond just the security features of the "voting machine". Election security requires involvement and coordination among the groups who actually "run" elections: state and local government officials, election offices and poll workers. In addition to using secure technology, these stakeholders rely on People, Processes, Procedures and Policies to ensure smooth, secure elections. The

procedures and processes must be defined and fully implemented by properly trained staff. Hart continually works to improve and provide technical security features, while working within the boundaries of the regulatory requirements of the industry as overseen by the EAC and state officials. Our customers continually focus on processes and procedures that support a secure election environment—including assessing realistic threats that faces all layers of security in an election.

When discussing the broad topic of election security, it is critically important to understand the different elements of the election systems in our country. Specifically, the distinction between:

1) the infrastructure and procedures surrounding voter registration (VR), and
2) the infrastructure and procedures that support vote capture, tabulation and audits

By design, these two elements are separate both in technology and process. Hart InterCivic is not a provider of voter registration systems.

Most of the recent stories about election security and "hacking" surrounding the 2016 general election are related to the upstream process of securing and managing voter registration data. While some news stories have accurately reported that the issues recently observed have happened exclusively in the area of VR and not in the area of vote capture, tabulation and auditing, many other stories have erroneously blended these elements, creating confusion among readers about where the problems actually lie.

Finally, it should be noted that the disparate election code/regulations across 50 states and the decentralized nature of the election tabulation systems in place across the country is, in and of itself, an element of the security of the voting systems. Note that more centralized systems (e.g. state voter registration databases which are required by federal law (HAVA) to be centralized and managed at a state level) have reportedly become targets of cyber-saboteurs.

Hart supports the continued evolution of voting standards at the federal and state levels. Election officials across the country are responsible for making wise investments with taxpayer dollars. They demand election systems which deliver the highest levels of value and voter confidence. As election officials raise the bar on security, performance, accessibility, reliability, flexibility and longevity requirements, Hart solutions will continue to exceed those requirements and provide the best value. A growing pool of regulations make the process of what we do and how we assist our customers even more important, and Hart is committed to staying abreast of changes and helping our clients stay in compliance.

For more information about election system security requirements, their evolution over time, their application at the national and state levels and various vendors' track records on being tested and certified to meet or exceed those requirements, I encourage you to contact the EAC.

Sincerely,

Phillip W. Braithwaite
President and CEO