



Wednesday, July 02, 2014

Mr. Scott Gessler
Secretary of State
State of Colorado
1700 Broadway, Suite 200
Denver, CO 80290

RE: Proposed Election Rules (June 26, 2014)

Dear Secretary Gessler:

Elections Systems & Software (ES&S) applauds the State of Colorado's continuing effort to increase transparency and security in the election process. In an effort to help attain the goals of the proposed rulemaking, ES&S recommends the language from page 53, lines 4-10, be amended to the following in order to simplify the language and intent of the rule along with removing any ambiguity to what penetration testing consists of. Like the State of Colorado, ES&S believes security is of the utmost importance in conducting elections and believes the Election Assistance Commission's (EAC) Voting System Standards reflect the gravity of security testing needed for voting systems. The below recommendation also provides congruency within the same rule (B) regarding source code evaluation.

“(A) Access Control and Data Interception and Disruption Testing conducted in accordance with the Security Testing Standards of the 2002 Voting System Standard or the most current version of the Voluntary Voting System Guidelines approved after January 1, 2008.”

ES&S thanks you for the opportunity to comment on the proposed Election Rules and hopes you take our recommendation into consideration.

Sincerely,

A handwritten signature in black ink that reads 'Chris J. Brusino'. The signature is written in a cursive, flowing style.

Chris J. Brusino
State Certification Manager
Election Systems & Software, LLC

Cc: Kathy Rogers, SVP of Governmental Relations, ES&S
Steve Pearson, VP of Voting Systems, ES&S