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To: Boards of Elections Using Direct Recording Electronic (DRE) Voting Units

Several inquiries have been made concerning the proper application of Physical Security Requirements for electronic voting units in the upcoming election. The purpose of this advisory is to reaffirm and clarify the policy underlying secure management of PEB/PCMCIA Cards, hereafter referred to collectively as "Cards," and to outline preferred Card-handling practices. For purposes of this advisory, voting units is defined but not limited to the device that houses the Card during the election process as well as the DRE unit.

Boards of Elections need no reminders of the importance of ballot security. With the introduction of DRE voting units with removable memory devices, however, the Secretary feels it is prudent to clearly articulate the differences between secure management of paper-based ballots and electronic ballots. Generally speaking, Cards should be treated as ballots and handled with the same standard of care. Unlike paper ballots, Cards do not have numbered stubs, matching tracking numbers nor are they pre-packaged by the ballot printer.

Cards should be maintained in the most secure fashion possible. As we recognize that Boards have many considerations when assigning and delivering equipment, the following guidelines should be helpful for you in determining the best process for insuring security (Note: only #1 is an absolute rule):

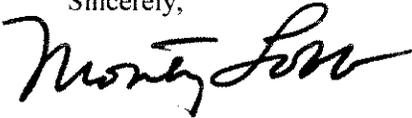
1. If voting units are pre-delivered to polling locations prior to Election Day, the Card may not be left with or within the voting units under any circumstances.
2. When voting units are pre-delivered (picked up, etc.) to a precinct judge or other election official responsible for setting up voting units prior to Election Day, it is preferable that Cards not be pre-loaded in the unit. Alternatively, the Board could adopt one of the following policies:
 - a. Deliver Cards along with precinct supplies to the polling location on the morning of the election;
 - b. Deliver Cards to a precinct election official other than the official in possession of the voting unit; or
 - c. Pre-loaded Cards be "sealed" with tamper-evident tape, held for a limited period of time by a sworn election official and written policies for insuring a complete review of voting equipment at the opening of polls are adopted by the Board.

3. When voting units are pre-deployed at polling locations, the Board may use any secure method for delivering Cards. They may be held securely by the Presiding Judge for a limited period of time before the election or delivered to polling locations the morning of the election as the Board sees fit. Provided Cards are not left with unattended voting units, either method of secure delivery is presumed valid.
4. Voting units may be pre-set – including the DRE with VVPAT, prior to Election Day. Remember, though, that this may make it impossible to “seal” the screen cover of the DRE depending on the type of DRE being used. Special care should be taken to use tamper-evident seals on the cover of the Card Slot Door on the voting unit as added protection against unauthorized access. Furthermore, the DRE units should be chained or cabled together through the carrying handle to physically secure the voting at that location and use a no-slack chain to go around the DREs in a cross pattern that is padlocked to secure the tablets.

We recognize that changing past practices of ballot handling and tracking can be logistically difficult for Boards. To the greatest extent possible, when defining your Card-handling procedures please give consideration to voter confidence, audit-ability and security.

If you have any questions, please contact Conni Siegmund or Joy West at (614) 466-2585.

Sincerely,

A handwritten signature in black ink, appearing to read "Monty Lobb". The signature is fluid and cursive, with the first name "Monty" being larger and more prominent than the last name "Lobb".

Monty Lobb
Assistant Secretary of State