

ALEX PADILLA | SECRETARY OF STATE | STATE OF CALIFORNIA OFFICE OF VOTING SYSTEMS TECHNOLOGY ASSESSMENT 1500 11<sup>th</sup> Street | Sacramento, CA 95814 | **Tel** 916.695-1680 | **Fax** 916.653.4620 | www.sos.ca.gov

September 6, 2018

Jessica Bowers Director, Certification Dominion Voting Systems, Inc. 1201 18th Street, Suite 210 Denver, Colorado 80202

Dear Ms. Bowers:

On Tuesday, August 28, 2018, the California Secretary of State Office of Voting Systems Technology Assessment (OVSTA) received a request for Administrative Approval, pursuant to California Elections Code section 19216, to update the firmware of the Democracy Suite 5.2 High Speed Scanner (HSS), used in conjunction with the approved Dominion Systems Inc. Democracy Suite 5.2 voting system, specifically the ImageCast Central (ICC). Per your request, the scanner as originally approved with the Democracy Suite 5.2 certification has a firmware update from version v0.9.808 to version v1.0.928.

California Elections Code section 19216 precludes a voting system or part of a voting system that has been approved by the Secretary of State from being changed or modified until the Secretary of State has determined the change does not impair its accuracy and efficiency.

If the Secretary of State determines the change or modification does not impair the accuracy or efficiency of the voting system, the Secretary of State may administratively approve the proposed change or modification.

Further, Secretary of State Administrative Approval Policy dictates, "[u]nless the change or modification is solely to a process or procedure, the change or modification must be submitted to a voting system testing laboratory (VSTL)."

With your request, you submitted the following documentation:

- DVS ECO 100483 Analysis from Pro V&V (VSTL)
- H12 Error Handling Procedure from Dominion Voting Systems Inc.
- High Speed Scanner Ballot Testing v0.1- From Dominion Voting Systems Inc.
- StatementFirmwareDVS from InoTec Organisationssyteme

The documentation from Pro V&V states, "[t]he high speed scanner (HSS) manufacturer has updated the firmware on their device to provide additional information to a user on

September 5, 2018 Page 2

the number of valid/invalid documents inside the HSS paper path after scanning has stopped due to an error (e.g., paper jam). The new firmware (v1.0.928) replaces the previous firmware version (v0.9.808). This change impacts the ICC component of the D-Suite 5.2-CA System." Pro V&V determined the change to be De Minimis.

Our office analyzed the documentation and determined the change does not impair the accuracy or efficiency of the voting system. Based on the application and additional supporting documentation submitted with your request, dated August 28, 2018, the administrative approval is granted. All other conditions of the Democracy Suite 5.2 certification, dated October 16, 2017, remain in effect.

Sincerely,

presan Lapsley

Susan Lapsley Deputy Secretary of State, HAVA and Counsel