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From: Neal McBurnett [REDACTED]
Sent: Wednesday, January 13, 2016 4:34 PM
To: SoS Rulemaking
Subject: McBurnett comments 12/15/2015 election rulemaking

I would like to support the comments for this rulemaking of Harvie Branscomb:

http://www.sos.state.co.us/pubs/rule_making/written_comments/2016/20160113Branscomb.pdf

In particular, I'd like to strongly underline the importance of the changes he suggests for the Cast Vote Record (CVR) format described in New Rules 21.4.14 and 21.4.15.

It is very important that voting system vendors support an effective, transparent Risk-Limiting Audit without causing privacy problems.

The CVR file must be published before the random selection of the CVRs to be audited, so the public can verify the integrity of the audit and independently tally the results from the file.

If, as Harvie explains, the CVR file can be used to link certain CVRs to identifiable voters, as can happen with people voting ballots with unusual ballot styles on known devices or in known batches, the system must support the removal of the Device ID or Batch ID columns to avoid the problem, and still allow the publication of the CVR file.

Generally speaking, though, it is much better to require that batches are managed in such a way that a list of voters voting in the batch is unknown, or that no unique ballot styles appear in any batches.

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