# Notice of Clarification

## NOC 07-004:  Voting System Manufacturing Facilities

Issued by Program Director, September 5, 2007:

*This notice addresses questions raised by a registered voting system manufacturer concerning the requirement that it provide the U.S. Election Assistance Commission a list of the facilities it uses to manufacture or assemble its voting systems.  The specific questions for clarification deal with the scope of this requirement.*

EAC Certification Program Manual requires, as a condition of registration, that each manufacturer provide the EAC with a *"list of all manufacturing and/or assembly facilities used by the manufacturer.*"(Section 2.3.1.7 of the EAC Voting System Testing and Certification Program Manual).  For the purposes of Section 2.3.1.7, "manufacturing and/or assembly facilities" applies to facilities that provide the following manufacturing services:
1.  Final system configuration and loading of programs for customer delivery.
2.  Manufacturing of component units of a voting system.
3.  Manufacturing of major sub-assemblies of the voting system.

For the purposes of this clarification, the following definitions apply:

**Voting system:**  The total combination of mechanical, electromechanical or electronic equipment that is used to define ballots; to cast and count votes; to report or display election results; and to maintain and produce any audit trail information.

**Component:**  An identifiable and discrete part of the larger voting system essential to the operation of the voting system, and an immediate subset of the system to which it belongs.

**Sub-assembly:**  A sub-assembly is defined as a major functional piece of equipment that is essential to the operational completeness of a component of that voting system. Examples of major sub-assemblies for voting systems include, but are not limited to:
- Printers
- Touch screen terminals
- Scanners/Tabulators
- Card readers

- Ballot boxes
- Keyboards
- CPUs
- Memory modules, USB drives, and other portable memory devices
- External data storage devices, external hard drives, etc.
- Motherboards, processor board and other PWB assemblies, when supplied separately from a complete unit

This requirement strengthens the EAC testing and certification program by providing a more complete picture of the manufacturing supply chain, from their major sub-assembly facilities to final system configuration prior to delivery of the product to the purchasing jurisdiction.

Manufacturing facilities for COTS components and plastic modeling facilities are **not** included in this definition and need not be reported to the EAC. The EAC reserves the right to ask manufacturers for any additional information related to the manufacturing process and facilities for the benefit of the testing and certification program.

Manufacturers shall report all current facilities that meet the above criteria. If manufacturing is not in progress at the time of a manufacturer's submission of their registration package to the EAC, the manufacturer shall report the last manufacturing facility meeting the definition in the previous paragraph. Manufacturers should also be aware that the reporting requirement is continuous and that when new manufacturing facilities are engaged, the EAC registration package should be updated to reflect the new facilities as required by Section 2.5.2 of the *Testing and Certification Program Manual*.