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New Yorkers for Verified Voting

Accessible Voting and Paper Ballot/Ballot Marker/Optical Scan Voting Systems

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Accessible Voting and Paper Ballot/Ballot Marker/Optical Scan Systems

One of the most important aims of election reform under the Help America Vote Act is to correct injustices perpetuated by inaccessible polling places and voting equipment. New Yorkers for Verified Voting fully supports providing the highest level of accessibility to disabled voters.

Evaluating voting systems requires that we consider several decisive and vital criteria. Accessibility for disabled voters is one important consideration, but there are others. The ability to properly audit elections, and the potential flaws and security vulnerabilities of a system must also be considered. Democracy depends on voters being justifiably confident that their vote will be counted. Given the many reports of serious security and accuracy problems with electronic touchscreen voting machines,[1] voters are justified in questioning this unproven technology. If we are to help America vote, we must consider the interests of *all* voters affected by new technologies.

A voting system must provide not only accessibility, but also reliability, accuracy, transparency, security, verifiability, and auditability. At this point in time, experts agree that these values are best guaranteed by a system based on paper ballots marked directly by voters.[2] An accessible technology called "Ballot Markers" is available which enables disabled voters to vote independently on a paper ballot based system. Paper ballot based systems do the most to guarantee that ballots are reliably recorded, accurately counted, and available for recounts and audits. This cannot be assured if our votes are recorded invisibly in unverifiable electronic circuits, as is the case with Direct Recording Electronic voting machines (DREs).[3]

Arguments have been made that only DREs meet the accessibility needs of disabled voters. But a closer look shows DREs to be among the *least* accessible alternatives in addition to being an unverifiable and unreliable technology. This document responds to and corrects some of these arguments and provides important information about the accessibility and suitability of voting systems based on paper ballots, accessible ballot markers, and optical ballot scanners.

In this paper we address the following topics –

- Do ballot markers provide independent voting for disabled voters?
- Do DREs provide independent voting for disabled voters?
- Do paper ballot based systems fulfill HAVA requirements?
- Do ballot markers provide disabled voters the same voting experience as other voters?

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[1] See, e.g., Government Accountability Office Report: "ELECTIONS: Federal Efforts to Improve Security and Reliability of Electronic Voting Systems are Under Way, but Key Activities need to be Completed", www.gao.gov/cgi-bin/getrpt?GAO-05-956

[2] Testimony of David L. Dill, April 18, 2005. Federal Election Reform Hearing, http://www.verifiedvotingfoundation.org/article.php?id=5987

[3] See, e.g., "Does the Voter Verified Paper Audit Trail Resolve Worries about DREs?", www.nyvv.org/reports/VVPAT-PB.pdf

DO BALLOT MARKERS[4] PROVIDE INDEPENDENT VOTING FOR DISABLED VOTERS?

In a letter to the Department of Justice (March 13, 2006), the New York Association for Independent Living and the New York State Independent Living Council argued against a plan that would have New York counties purchase an accessible voting device for each polling place for Fall 2006. They argued that none of the currently available devices provide adequate accessibility.

> *"The ballot markers for optical scanners, while largely very accessible, still require a voter to insert and remove the ballot from the machine itself and to insert it into the optical scanner as well."* (http://www.ccfi.us/dojsignonletter.html)
>
> *"All optical scan ballot markers we have tested require the insertion and removal of the ballot by hand, which eliminates anyone who has mobility or dexterity issues from being able to use the voting system independently."* (http://www.ccfi.us/dojcolleague.html)

When evaluating the above statements the following points must be considered:

- **No voting machine or assistive device of any type provides complete accessibility and independence.**

  In July 2005 the US Election Assistance Commission issued an analysis acknowledging that complete independence may not be possible for all disabled voters.[5] The National Association of Protection and Advocacy Systems (now the National Disability Rights Network) has said that currently no one voting machine is accessible to persons with all types of disabilities. *But it also points out that "most of the other machines on the market are significantly less accessible to voters with dexterity disabilities" than the AutoMARK ballot marking device*.[6]

  Kara Lee-Brunton, policy analyst for the United Spinal Association and a member of the Rights Task Forces Voting Work Group of the Consortium of Citizens with Disabilities has stated that "*at this time, there is not a perfect machine. No single voting machine is 100% accessible for everyone.*" She urges that states choose "*the most accessible machine available*" rather than delay HAVA implementation.[7]

- **Ballot markers rank high in evaluations by disabled voters.**

  The AutoMARK ballot marker gained the highest overall weighted score (77.25) in the survey taken at the Oregon "Accessible Voting Systems Fair" in April 2005. With those having multiple disabilities, ballot markers and scanners were the top choice with the Avante/Optical Scan Voting System (80.00) and the AutoMARK (74.33) rated first and second.[8]

  Studies such as those cited above demonstrate support for ballot markers by voters with different disabilities. We have attached a statement from A.J. Devies of Volusia County, FL, president of

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[4] Recently some vendors of ballot markers and other assistive devices have made bids for adoption in NY as part of what is called "Plan B" for Fall 2006. The current document does not assess these devices, as a comparison will be addressed in a coming report. This document cites examples of the AutoMARK ballot marker, since it has been demonstrated in NY for more than a year, is federally certified to the 2002 standards, and has been certified in Alabama, Arkansas, Arizona, California, Idaho, Illinois, Iowa, Kansas, Maine, Minnesota, Michigan, Nebraska, New Mexico, North Carolina, North Dakota, Ohio, Oregon, Pennsylvania, Rhode Island, South Dakota, Texas, Virginia, Washington, West Virginia, Wisconsin, and Wyoming.

[5] "There may be certain disabled voters whose disabilities prevent them from voting independently," EAC Advisory 2005-004, http://www.eac.gov/section_301.html

[6] See attached, "Voting Machines and Dexterity Disabilities"

[7] http://www.unitedspinal.org/2005/10/27/disability-community-remains-concerned-over-accessibility.org

[8] http://www.sos.state.or.us/elections/HAVA/vendorfair/survey_results/vendor_fair_summary.pdf

Handicapped Adults of Volusia County (HAVOC) who has endorsed ballot markers. Additional testimonials are listed on various ballot marker vendors' websites.[9]

- **Polling Place Procedures Minimize the Need for Manual Ballot Handling**

  Some states using optical ballot scanners have adopted polling place procedures where a poll worker places the ballots into the scanners for all voters. Each voter hands their completed ballot to the poll worker protected by the privacy sleeve. The poll worker then places the ballot in the scanner for every voter.

  This procedure eliminates the objection that insertion of the ballot into the marker or scanner disadvantages people with reduced mobility.

- **Privacy of paper ballots is protected by ballot design.**

  There are several ways to protect the privacy of the vote for individuals who use ballot markers to mark their paper ballots. One method uses special ballots which have no visible text printed on the ballot. The ballot marking device marks the blank ballot as instructed by the voter via the accessibility interfaces. When the ballot is marked, it contains no visible text but only the marks on a blank page. While not readable by a poll worker or others in the polling place, the marked, but text free blank ballot can be read by the scanner. This preserves the privacy of the ballot. In the case of a manual recount or audit, an overlay allows the blank ballot to be read[10] by election officials.

DO DRES PROVIDE INDEPENDENT VOTING FOR DISABLED VOTERS?

To evaluate accessibility of different voting systems, it is essential that there be a full and fair comparison of the accessibility provided by each type of system. This must include a full review of how a disabled voter interacts with the system, not just at the moment they actually record their vote, but from the time they approach the device through the time they leave it.

Before claiming that DREs provide independent voting, the complete set of required interactions with the machine must be considered. In particular, the following questions must be answered:

1. Do disabled voters need assistance in adjusting the DREs for their use?
2. Do they need assistance in lowering them to an accessible height?
3. Do they need assistance placing Voter Access Cards in slots?
4. Do they need assistance in attaching any assistive devices?
5. Do they need assistance in verifying their vote?

- **DREs are less accessible for the mobility and dexterity impaired than ballot markers.**

  While acknowledging the limitation on independence posed by the requirement on some ballot markers that the ballot be re-inserted for verification, the United Spinal Association points out that, *"Direct Recording Electronic (DRE) voting machines are less accessible to voters with dexterity disabilities because many DREs are not adaptable for individuals who cannot lift their arms or use their finger effectively"* (United Spinal Association, *op cit*).

[9] See http://www.populex.com/DPB_Intro.htm;
also http://www.automarkts.com

[10] See the attached "Voting Machines and Dexterity Disabilities"

- **DREs do not provide full independence for many disabled voters.**

  Comparative studies in August 2005 showed that the AutoMARK ballot marker provided complete accessibility for more kinds of disabilities than DREs.[11]

  The full face DREs currently marketed in New York have only recently begun to demonstrate both assistive devices and voter verification, so they were not included in the 2005 study. However, advocates for the disabled have been severely critical of these full face machines.

- **Touchscreen DREs require voters to insert a small card prior to voting. This is difficult for voters with a variety of impairments.**

  Voter Access Cards (VAC) are used in touchscreen DREs to determine which ballot to display to the voter. These small plastic cards must be inserted by the voter into a small reader slot as the first step in voting on the DRE. The size of credit card, the VAC requires much finer dexterity than a letter or legal sized paper ballot. Many voters with visual, mobility and dexterity impairments may need assistance to insert this small card as well as to determine its proper orientation.

  Ballot markers and scanners allow ballot insertion in any orientation while the VAC does not. Since the cards typically have no tactile features indicating orientation of the card by touch alone, on some DREs the only indication that the card is inserted incorrectly is a visual cue on the touchscreen. But visually impaired voters may not see this visual alert. On some DREs, there is no other indication that the card is improperly inserted.

- **Voters using DREs often require poll worker assistance while their ballots are visible.**

  Whenever screens freeze up, votes are shown differently than the voter intended, VAC cards jam, printers fail to print the paper trail, etc., poll workers must be called upon for assistance. They must enter the DRE booth while voter selections are still displayed on the DRE screen. All voters are affected by this loss of privacy caused by failure prone DREs.

DO PAPER BALLOT BASED SYSTEMS FULFILL HAVA REQUIREMENTS?

NYVV already has addressed those who argue that voting systems using paper ballots, ballot markers and scanners cannot fulfill the requirements of HAVA because of the need to carry the marked ballot to the scanner.[12] This argument sometimes shows special concern about visually impaired voters, many of whom have expressed enthusiasm about the ballot markers (see footnote #9). Actually, most disabled persons find carrying the ballot to the scanner quite manageable, especially in the light of the HAVA-mandated opportunities for voters to try the equipment in advance. Many persons with visual impairments take pride in their ability to manage such tasks.

A rope or bar or auditory signal can be used as a guide between the ballot-marker and the scanner for the visually impaired. Polling places need to be arranged to allow persons in wheelchairs to move to the scanner with the ballot; the height of the scanner has not been a problem for wheel chair users. We note above several ways to protect the privacy of the ballots that have been devised. In addition, ballot markers and scanners mark and read ballots in any orientation, so they can be inserted backwards, forwards, right side up or upside down.

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[11] See http://www.verifiedvotingfoundation.org/accesscharts

[12] See, "Commentary on the Onondaga Election Commissioners' Press Release", http://nyvv.org/reports/OnondagaBOEprRe.pdf

DO BALLOT MARKERS PROVIDE DISABLED VOTERS THE SAME VOTING EXPERIENCE AS OTHER VOTERS?

Equality of opportunity does not and cannot require that the voting experience be identical in every detail. This is clearly articulated in the July 2005 Election Assistance Commission's Advisory cited above when it states [*emphasis added*]:

> "The voting system must afford a disabled voter the ability to perform the same *functions* (e.g., receiving and reading the ballot, making selections, reviewing selections, changing selections, and casting the final ballot) as are afforded to a non-disabled voter. *These functions may be provided to the disabled voter through features of the voting system that are different than those used by non-disabled voters. The disabled voter need not and in many cases cannot have an identical voting experience as a non-disabled voter…"*

A voting system equipped with accessibility features requires that disabled voters use features and devices which other voters do not use. Voters using accessibility devices do NOT vote in the identical way to voters who do not use these devices. DREs do not and cannot provide the identical voting experience for all voters.

- **Ballot Markers do not separate voters into identifiable groups.**

  In jurisdictions using paper ballot/ ballot marking systems, each voter can be invited to take the paper ballot to either the privacy booth to mark with a pen or to use the ballot marker. Anyone can choose to use the ballot marker, whether or not they are disabled.

- **Ballot markers are used by many voters who are not disabled.**

  Ballot markers provide not only accessible voting, but are also providing multilingual access, another key HAVA requirement. Ballot markers display and provide text and audio in multiple languages.

  In addition, there are many elderly voters who benefit from the large print and contrast change features of ballot markers.

- **Polling places equipped with ballot markers and scanners eliminate lines and delays for all voters.**

  Privacy booths, curtained off areas where voters mark their ballots privately, by pen or using a ballot marker are inexpensive and easy to deploy in large numbers. Because most time voting is spent at the point where the voter is actually making their choices, the ability to easily add multiple privacy booths makes the flow of voters smooth, placing less pressure on each voter. Multiple privacy booths for marking the ballot using pens and ballot marker serve multiple voters simultaneously. Voters can take as much time as they need in the privacy booth without delaying others.

  In contrast, DRE systems accommodate only one voter at a time. Each voter must access the right ballot using the voter access card, then make their selections, and, finally, verify the votes by comparing the vote on the monitor with the audit trail on the printer. In addition to these steps, disabled voters may need additional time to have the machine adjusted and set up with accessibility controls. It will also take additional time to vote using these interfaces. Since all steps of the voting process- set up, vote recording, vote casting, VVPAT printing and verification take place in the DRE itself, lines form behind the DREs, and voters can feel pressured to quickly finish up without completing all necessary steps.

CONCLUSION

A voting system based on paper ballots, ballot markers, and ballot scanners provides the most accessible, auditable, secure, practical and economical choice among currently available voting systems. We recognize and support the requirement for equal access for all voters *to and in* the polling place. While we must provide all voters the assurance that they can vote, we must also provide them the assurance that their votes will be counted.

Statement by A. J. Devies
President of Handicapped Adults of Volusia County

Ms. Devies is a voter with mobility disabilities
and a Board member of the Florida Fair Elections Coalition

April 4, 2006

A Response to the letter from the New York Association on Independent Living and the New York State Independent Living Council to the U. S. Department of Justice, March 13, 2006

The experience of voting "privately and independently" [HAVA 301(a)(3)(A)] cannot be the same for every single person. For example, a blind person is going to need assistance getting from the voting booth to the op-scan and/or the exit door. Here are two truths that advocates for accessibility must emphasize:

1. There is going to be some loss of independence at some point in the process regardless the method of casting a ballot.
2. The focus must be on the privacy and independence of making selections once the voting device has been prepared and the person is in place.

If the main criticism of ballot markers is on behalf of those with dexterity impairments, one must ask: what about the Voter Access Cards required to use a DRE? That's smaller than a paper ballot, and so is the slot into which it is inserted. Ask any person who says the AutoMARK or Vote-PAD or other ballot markers can't be certified or used because a disabled person can't handle paper how that disabled person is going to handle the Voter Access Card required to vote on DRE's. The VACs are smaller, as is the slot. Visually-impaired people are going to have at least some difficulty handling paper ballots; but they also will have trouble with the VACs. They are going to be groping for the slot for the paper or for the VAC. Unless there is some tactile marking on the VAC to indicate orientation, and the visually-impaired voter has been verbally instructed as to the location and purpose of the tactile marking, then the poll worker would have to insert the VAC. This is a lack of independence comparable to a poll worker inserting a ballot in a marker.

Ballots have been designed for ballot markers that are blank except for the correctly calibrated marking locations. This protects privacy if assistance is needed for reinserting the ballot for verification, carrying the ballot to the ballot box or optical scanner, or inserting the ballot into the ballot box or optical scanner.

Here are some adjustments of voting equipment with which disabled voters may need help:

Signing in: A visually-impaired person is going to need help signing in. Some use a rubber stamp with their signature, which ADA says is legal, while others use a rubber template with an opening for their signature. They feel the edges of the opening to "stay between the lines." A poll worker would have to position the opening in the template on the poll list. If e-poll books are used, this is not a problem.

Voter Access Cards (VAC): The next issue is handling the VAC. Many blind people can deal with something like that better than sighted people, but others can't due to age or aversion to technology. It may be necessary for a poll worker to insert the VAC or assist in inserting the VAC so that it is correctly oriented.

Locating the machines: Unless the precinct is set up with a tactile method of locating the DRE, the visually-impaired person will need assistance in even finding the DRE. Someone suggested a rope from the sign-in/e-poll book to the DRE. However, the visually-impaired person will still need instructions on how to locate the rope and follow it to the DRE. This is another loss of independence for the visually-impaired person.

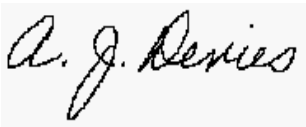
Height: Even with the DRE at an acceptable height according to ADA regulations, it may be necessary to adjust the DRE for glare, angle (in case someone can't move their neck into a comfortable position to actually see the DRE). In most cases it is not reasonable to expect a disabled person to adjust height, tilt, reach. That will have to be done by a poll worker. Same for inserting the ballot if the person is unable to reach the top of the ballot marker, either because they are in a wheelchair or just because they happen to be shorter than average.

Adjustments of controls: If the DRE does not have a tethered keypad, are the controls reachable from a seated position?

Headphones: The poll worker may also need to indicate the position of the headphone jack on the DRE. Jurisdictions are required to have a new headphone for each voter who requests one. The headphones should be the inexpensive, disposable kind. Many people will use their own headphones.

Orientation to the controls: The poll worker may need to explain the basic controls on the DRE - location of the keypad, volume adjustment for the audio, contrast and font size change controls, and how to select a language if the DRE defaults to English. Some voters can proceed on their own once they are oriented to the controls. Others may need a lot more explanation.

Let's face it. There is absolutely no way a severely visually-impaired person is going to be able to walk into the precinct, sign in/check in, obtain a Voter Access Card, get to the DRE, vote, return the Voter Access Card, and exit the precinct without assistance at some point in the process. Neither is there anyway that those with mobility impairments are going to be able to independently make all the adjustments of height and orientation that would seem to be essential with the large full-face DREs that will be marketed in New York. Accessibility advocates need to focus primarily on achieving the highest degree of independence and privacy possible in the process of actually voting rather than on impossible demands for complete independence in the logistics of preparing to vote.



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Voting Machines and Individuals with Dexterity Disabilities

This memorandum is designed to clarify the National Association of Protection and Advocacy Systems' (NAPAS)[1] position with respect to dexterity accessibility and the AutoMARK voting system and other voting machines.

NAPAS' Position

NAPAS is committed to ensuring that elections are accessible to all voters with disabilities, including those with dexterity disabilities. NAPAS does not endorse the AutoMARK or any other voting machine. NAPAS supports a fair, complete, and factually-accurate dialogue in the disability community about the accessibility of voting machines so that voters with disabilities can make informed choices about voting systems for their communities.

There are a number of machines on the market, none of which fully meets the needs of all persons in the disability community. Some offer better accessibility features than others. NAPAS does not disagree with all of the criticism of the AutoMARK machine, but is concerned that a campaign has been waged against the AutoMARK machine in particular, even though most of the other machines on the market are significantly less accessible to voters with dexterity disabilities. Only three voting systems on the market -- AccuPoll, AutoMARK, and eSlate machines -- have a dual switch input option. A dual switch input on a machine allows voters with dexterity disabilities who use technology, like sip and puff, to mark their choices on a ballot independently. Many machines, such as those produced by Diebold and Sequoia, do not have a dual switch input option, which means that voters with dexterity disabilities that use a sip and puff, foot petals, joy sticks or other alternative selection devices, will not have privacy or independence in any part of the voting process. Voters with dexterity disabilities who need to use these types of devices to make selections must have a poll worker or someone else make their selection for a candidate, thereby totally denying them a private and independent vote.

It is difficult to understand why the AutoMARK machine in particular has become the focus of such intense criticism when other machines provide far less accessibility or no accessibility at all for individuals with dexterity impairments. Georgia, Maryland and Washington, D.C., for example, have been praised by some AutoMARK critics for the accessibility of their voting systems, even though their machines are inaccessible to voters with dexterity disabilities because they lack a dual switch input option (described above) that AutoMARK and some other machines provide. On the other hand, jurisdictions that opt for AutoMARK, with the support of disability advocates in their states, have been threatened with suit.

AutoMARK Accessibility

There is no fully accessible voting machine at this time. Some disability advocates believe that the AutoMARK may provide the best features currently available on the market, but AutoMark has limitations as do all other machines. While the

[1] On July 21, 2005, NAPAS will be changing its name to the National Disability Rights Network (NDRN).

AutoMARK enables voters with manual dexterity impairments to mark the ballot privately and independently, once finished, a voter must transport the ballot from the AutoMARK terminal to the tabulation device, which many voters with dexterity disabilities are unable to do independently. AutoMARK has developed a solution to the privacy issue that is currently available.[2] The solution involves the use of an alternative ballot form. Instead of a standard ballot – i.e., with the names of the candidates and offices -- voters that need assistance transporting their ballot to the tabulator can opt to receive a coded ballot, with bubbles, numbers, and computer bar codes, which are computer readable, but which retains the secrecy of the ballot. Voters with dexterity disabilities can view their ballot on the touch screen and make their selections using their communication device of choice. After the voter has reviewed and finalized his/her votes, the machine would fill in the bubbles on the ballot. Since the bubbles on the ballot have no corresponding text, they cannot be read by others. Once the ballot is inserted in the ballot tabulator, the vote is recorded and the ballot is stored in the tabulator machine. In the case of a manual recount, an overlay is matched up with a bar code imprinted on the ballot in order to read the voter's choices.

Because the AutoMARK requires an alternative ballot for voters with dexterity disabilities, it is imperative that effective election administration procedures be put in place to ensure that these individuals' votes are indistinguishable from other votes. Just like in jurisdictions that only meet HAVA's minimum requirement of one accessible voting machine per polling place, election officials must make certain that more than one person votes on the accessible voting machine (even if there is only one person with a disability using that polling place) in order to protect the privacy of each vote. Likewise, if an AutoMARK alternative ballot is used at a polling place, the jurisdiction must make certain that more than one person uses the alternative ballot to ensure each voter's privacy.

Where do we go from here?

In less than five and a half months, the Help America Vote Act of 2002 (HAVA) requires each state to have one accessible voting machine per polling place.[3] In this short time, the disability communities in each state, including individuals with dexterity disabilities, need to be involved in the process of selecting one machine in their jurisdiction that they believe will work best for all voters with disabilities. Unfortunately, as explained above, the pool of existing machines that are accessible in any way to voters with dexterity disabilities is very small. This is due in large part to the current federal voluntary voting system standards and certification requirements developed by most states. The current guidelines developed by the Federal Elections Commission in 2002 are lacking in the area of accessibility for voters with dexterity disabilities.

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[2] The AutoMARK manufacturers are considering instituting a privacy sleeve to further improve the accessibility of their voting system. While we welcome any improvements that might make the voting process more accessible to voters, the privacy sleeve is simply a proposal and is not available at this time. Voters with dexterity disabilities may want to consider the privacy sleeve as a potential future improvement, however, they should use caution in relying on manufacturers' promised improvements when evaluating voting machines.

[3] Section 301 of HAVA requires that one voting systems that is accessible to individuals with disabilities be available at each polling place by January 1, 2006. 42 USC § 15481.

At this point, the future looks no brighter. The Election Assistance Commission (EAC) is proposing new guidelines, but these proposed guidelines will not take effect by the January 1, 2006 deadline requiring one accessible voting machine per polling place. These proposed guidelines will, however, apply to future HAVA deadlines. For example, HAVA requires that all machines purchased with HAVA funds after January 1, 2007 be accessible.[4] However, the EAC's proposed Volunteer Voting System Guidelines (VVSG) that will govern future accessible machines do not adequately address the barriers existing for voters with dexterity disabilities. The EAC's VVSG are open for public comment until September 30, 2005. It is imperative that the disability community demand that the EAC modify its proposed guidelines to require features that make voting machines completely private and independent for voters with dexterity disabilities.[5]

Conclusion

Unfortunately there is currently no one true accessible voting machine, i.e., a machine that is accessible to voters with all the types of disabilities. For instance, there is no machine on the market that accommodates voters who are both deaf and blind. Still, HAVA requires that states have one "accessible" voting machine in each polling place by January 1, 2006, so the disability community must insist that states buy machines that are accessible to as many voters with different types of disabilities as possible. In order to do this, there must be dialogue among voters with various disabilities and disability advocacy organizations within each state or local jurisdiction in order to advocate that states make the best decision regarding accessible voting.

NAPAS is the nonprofit membership organization for the federally mandated Protection and Advocacy (P&A) Systems and Client Assistance Programs (CAP). Collectively, the P&A/CAP network is the largest provider of legally based advocacy services to people with disabilities in the United States.

For questions about this memo, contact
Christina Galindo-Walsh, Senior Staff Attorney at christina@napas.org

[4] Section 301(a)(3)(C) of HAVA requires that one voting systems that is accessible to individuals with disabilities be available at each polling place by January 1, 2006. 42 USC § 15481.

[5] Information on how to submit comments on the proposed Volunteer Voting System Guidelines to the EAC is available on their website, www.eac.gov.