

**REQUEST FOR INTERPRETATION BY THE NYS BOARD OF ELECTIONS**

<b>Requestor(s)</b>	<b>J. Garcia</b>
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<b>Request Date</b>	<b>5/22/2008</b>
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<b>Requestor Contact Information</b> <i>(Name, telephone, fax, mailing address, &amp; email address)</i>	<a href="mailto:jgarcia@systest.com">jgarcia@systest.com</a> <b>303-575-6881</b>
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<b>NYS Election Law, Guideline, or Other Issue to be Clarified</b> <i>(cite specific reference)</i>	<p><b>7.4.6 Software Setup Validation</b></p> <p>c. The verification process shall be able to be performed using COTS software and hardware available from sources other than the voting system vendor.</p> <p>i. If the process uses hashes or digital signatures, then the verification software shall use a FIPS 140-2 level 1 or higher validated cryptographic module.</p> <p>ii. The verification process shall either (a) use reference information on unalterable storage media received from the repository or (b) verify the digital signature of the reference information on any other media.</p>
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<b>Statement of Ambiguity</b>	“Verification process”
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<b>Facts Supporting Ambiguity</b>	<ul style="list-style-type: none"> <li>• This is a <u>verification process</u> using COTS software and/or hardware.</li> <li>• Purchasing and using COTS software/hardware to extract modules/binaries poses a security risk and</li> </ul>
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	<p>the possibility of opening the voting system to vulnerabilities.</p> <ul style="list-style-type: none"> <li>• Modifying the COTS software/hardware to meet security risk will make the COTS software/hardware non-COTS.</li> </ul>
<p><b>Proposed Interpretation</b></p>	<p>The requirement states the verification process shall be able to be performed using COTS software and hardware available from sources other than the voting system vendor. SysTest Labs interpretation is as follows:</p> <ul style="list-style-type: none"> <li>• Vendor supplies the code to SysTest Labs for a software application tool to extract binaries from the voting system</li> <li>• SysTest Labs executes a full source code review, as well as verifying that all modules/binaries are being pulled to create the hash values</li> <li>• SysTest Labs creates and install the build</li> <li>• SysTest Labs extracts the binary/modules</li> <li>• A COTS software/hardware tool is executed to verify the hash values (this is the verification process as stated in the VVSG 7.4.6d requirement)</li> </ul> <p>Currently, this is how SysTest Labs is meeting this requirement for our VSTL clients.</p>

Please submit "Request for Interpretation" to:

NYS BOARD OF ELECTIONS  
 ELECTION OPERATIONS UNIT  
 ATTN: R. Warren  
 40 STEUBEN ST  
 ALBANY, NY 12207

OR:

[election\\_ops@elections.state.ny.us](mailto:election_ops@elections.state.ny.us)

**NOTE: Interpretations by SBOE will be provided in a separate, attached, document.**