



December 12, 2018

Secure, Accessible and Fair Elections (SAFE) Commission
Secretary of State's Professional Licensing Boards Division Office
237 Coliseum Drive
Macon, GA 31217)

Dear Members of the SAFE Commission:

The National Election Defense Coalition is a national, non-partisan, not for profit organization committed to promoting secure, accessible, transparent and trustworthy elections. Freedomworks is a national organization of over 6 million members passionate about promoting free markets and individual liberty. Our members share three common traits, a desire for less government, lower taxes and more economic freedom.

We write to you as the SAFE Commission considers developing Requests for Proposals for new voting equipment because we are gravely concerned that vendors are promoting unnecessarily costly and less efficient electronic Ballot Marking Devices for all voters. These devices will cost Georgia taxpayer three times more than the most common and efficient paper ballot voting method, hand-marked paper ballots.

Georgia is rightly moving to replace its notoriously insecure paperless voting machines to provide a voter-verified paper ballot. However, the electronic Ballot Marking Devices (BMDs) that vendors have been aggressively promoting to provide a paper ballot are completely unnecessary and amount to nothing more than a boondoggle for the vendors and an enormous waste of taxpayer dollars.

Over 70% of the nation votes on paper ballots that are marked by the voter with a pen and counted by an electronic scanner. (In these jurisdictions polling locations also offer at minimum, one electronic BMD for voters that may have difficulty marking a paper ballot by hand, allowing them to mark the ballot privately and independently.)

If Georgia is to purchase BMDs for all voters this would mean that most voters would be using an expensive electronic device that costs several thousand dollars to perform the same task as a pen. Proposals from the vendors to supply Georgia with BMDs have been estimated to cost well over \$100 million; comparatively it's estimated that providing optical scanners to count ballots marked by pen (and providing at least one BMD to offer accessible technology for voters that may need assistance) would cost roughly \$ 35 million.

The excessive cost for BMDs is not limited to the initial outlay to purchase the technology. BMDs will require expensive, ongoing technical maintenance and service contracts. Each BMD will need to be programmed with election contest files before each election, incurring programming costs. BMDs will require additional storage and trucking costs. BMDs require more time and effort for election workers to setup and take down; they require considerable space and power outlets in polling locations. Furthermore, contrary to assertions by voting system vendors, using BMDs will not save counties the cost of layout and printing of paper ballots. Each county will still need to print absentee/emergency/provisional/challenge ballots even if they use BMDs.

Moreover, BMD are NOT more efficient for the marking of paper ballots. It typically takes considerably longer for a voter to scroll through a ballot, page by page, to make selections on a BMD than to mark a paper ballot. Additionally, the number of voters that can vote at one time is constrained by the number of BMDs at a polling location, which will increase wait times and lines at polling locations. This serious deficiency of BMDs was demonstrated in Johnson County, Kansas which experienced devastatingly long lines in its 2018 primary after implementing BMDs¹. Furthermore, if BMDs fail on Election Day this will exacerbate wait times and could prevent voters from voting. Conversely, with hand-marked paper ballots voters need only a pen and a place to mark their ballot, making it easy to scale-up during busy voting periods, decreasing lines and wait times and they cannot fail on Election Day.

Opponents of hand-marked paper ballots may claim that the voters' marks vary introducing inconsistencies in vote counting by the scanners. While this may have been a problem fifteen years ago, today's sophisticated scanners are able to discern voter marks carefully and efficiently flag questionable ballots for adjudication.

Purchasing and requiring all voters to use electronic BMDs will be a needless waste of taxpayer dollars and will provide an inferior voting experience for Georgia citizens. We respectfully urge the SAFE Commission to recommend Georgia adopt efficient, cost-effective hand-marked paper ballot systems used successfully by most of the nation.

Thank you very much for your very important work on this critical issue and for your consideration.

¹ Lynn Horsley, Steve Vockrodt, Hunter Woodall, "JoCo blames new voting machines, big turnout for long delay while nation waited," *Kansas City Star*, Aug. 8, 2018
<https://www.kansascity.com/news/politics-government/election/article216316320.html>

Sincerely,

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National Election Defense Coalition

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