Proposed Regulatory Action: Risk Limiting Audits

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> but shall not compare those interpretations to the
> corresponding cast vote records

How, then, would one improve the computerized interpretations if there is no real-world feedback?

> Subject to Elections Code section 2194(a), cast vote record data shall
> not be posted to the
> elections official's website, but shall be made available to the
> public at the location where the
> audit is being conducted.

??? What is the rationale for not publishing the CVR data, along with ballot images and the checksums that verify the validity of the data? You do mention later:

> an elections official who conducted an RLA shall review its cast vote
> records file that was
> published and redact from the public record, but not its own files,
> the voter choices
> corresponding to any ballot susceptible to being personally identified
> with an individual voter.

but it should be possible to programmatically remove such identifiers. Maybe there's stuff in a CVR I don't understand, but it should mostly be just the coordinates of the marks on the "ballot card".

> Participating counties shall conduct a risk-limiting audit on one or
> more contests fully contained
> within the county's borders.

You make this point several times. Still, the biggest whoop-de-doo is over the election of statewide electors, which are not contests fully contained within county borders. It seems like an RLA audit of statewide contests would be important, too. The rationale says:

> This change is necessary to avoid a challenge to this practice in
> concert with the audit.

"is necessary to avoid a challenge" necessarily needs clarification. :)

WRT a random seed, are you going to specify the algorithm for the pseudo random sequence, too, or leave that unspecified? Some algorithms are better than others but whatever is chosen, it should be a good one and chosen before the audit begins. That all is esoteric enough that I doubt anyone could game it, but still ... just for completeness.

> Only records
> used in the audit are mandatory because these are ones that members of
> the public would use to
> recreate the audit.

There are some people who are willing and capable of doing a 100% audit of ballot images. If the images can be authenticated, then such "crowd sourced" auditing would add a lot of confidence to the result as well. We'd need authenticated CVRs and images tho. (Yes, I'm one of those "willing and capable" :)