POWERFUL TECHNOLOGY SOLUTIONS
FOR THE CITY AND PUBLIC WE SERVE

2018 Surveillance Impact Report

CLOSED CIRCUIT TELEVISION "TRAFFIC CAMERAS"

SEATTLE DEPARTMENT OF TRANSPORTATION

January 31, 2019

Seattle
Information Technology

CONTENTS

SURVEILLANCE IMPACT REPORT OVERVIEW 7

HOW THIS DOCUMENT IS COMPLETED 7

PRIVACY IMPACT ASSESSMENT 8

PURPOSE 8

WHEN IS A PRIVACY IMPACT ASSESSMENT REQUIRED? 8

1.0 ABSTRACT 8

1.1 PLEASE PROVIDE A BRIEF DESCRIPTION (ONE PARAGRAPH) OF THE PURPOSE AND PROPOSED USE OF THE PROJECT/TECHNOLOGY. 8

1.2 EXPLAIN THE REASON THE PROJECT/TECHNOLOGY IS BEING CREATED OR UPDATED AND WHY THE PIA IS REQUIRED. 9

2.0 PROJECT / TECHNOLOGY OVERVIEW 9

2.1 DESCRIBE THE BENEFITS OF THE PROJECT/TECHNOLOGY. 9

2.2 PROVIDE ANY DATA OR RESEARCH DEMONSTRATING ANTICIPATED BENEFITS. 10

2.3 DESCRIBE THE TECHNOLOGY INVOLVED. 11

2.4 DESCRIBE HOW THE PROJECT OR USE OF TECHNOLOGY RELATES TO THE DEPARTMENT'S MISSION. 11

2.5 WHO WILL BE INVOLVED WITH THE DEPLOYMENT AND USE OF THE PROJECT / TECHNOLOGY? 12

3.0 USE GOVERNANCE 13

3.1 DESCRIBE THE PROCESSES THAT ARE REQUIRED PRIOR TO EACH USE, OR ACCESS TO/ OF THE PROJECT / TECHNOLOGY, SUCH AS A NOTIFICATION, OR CHECK-IN, CHECK-OUT OF EQUIPMENT. 13

3.2 LIST THE LEGAL STANDARDS OR CONDITIONS, IF ANY, THAT MUST BE MET BEFORE THE PROJECT / TECHNOLOGY IS USED. 13

3.3 DESCRIBE THE POLICIES AND TRAINING REQUIRED OF ALL PERSONNEL OPERATING THE PROJECT / TECHNOLOGY, AND WHO HAS ACCESS TO ENSURE COMPLIANCE WITH USE AND MANAGEMENT POLICIES. 14

4.0 DATA COLLECTION AND USE 15

4.1 PROVIDE DETAILS ABOUT WHAT INFORMATION IS BEING COLLECTED FROM SOURCES OTHER THAN AN INDIVIDUAL, INCLUDING OTHER IT SYSTEMS, SYSTEMS OF RECORD,

DRAFT

COMMERCIAL DATA AGGREGATORS, PUBLICLY AVAILABLE DATA AND/OR OTHER CITY DEPARTMENTS. 15

4.2 WHAT MEASURES ARE IN PLACE TO MINIMIZE INADVERTENT OR IMPROPER COLLECTION OF DATA? 15

4.3 HOW AND WHEN WILL THE PROJECT / TECHNOLOGY BE DEPLOYED OR USED? BY WHOM? WHO WILL DETERMINE WHEN THE PROJECT / TECHNOLOGY IS DEPLOYED AND USED? 16

4.4 HOW OFTEN WILL THE TECHNOLOGY BE IN OPERATION? 16

4.5 WHAT IS THE PERMANENCE OF THE INSTALLATION? IS IT INSTALLED PERMANENTLY, OR TEMPORARILY? 16

4.6 IS A PHYSICAL OBJECT COLLECTING DATA OR IMAGES VISIBLE TO THE PUBLIC? WHAT ARE THE MARKINGS TO INDICATE THAT IT IS IN USE? WHAT SIGNAGE IS USED TO DETERMINE DEPARTMENT OWNERSHIP AND CONTACT INFORMATION? 17

4.7 HOW WILL DATA THAT IS COLLECTED BE ACCESSED AND BY WHOM? 18

4.8 IF OPERATED OR USED BY ANOTHER ENTITY ON BEHALF OF THE CITY, PROVIDE DETAILS ABOUT ACCESS, AND APPLICABLE PROTOCOLS. PLEASE LINK MEMORANDUMS OF AGREEMENT, CONTRACTS, ETC. THAT ARE APPLICABLE. 18

4.9 WHAT ARE ACCEPTABLE REASONS FOR ACCESS TO THE EQUIPMENT AND/OR DATA COLLECTED? 19

4.10 WHAT SAFEGUARDS ARE IN PLACE, FOR PROTECTING DATA FROM UNAUTHORIZED ACCESS (ENCRYPTION, ACCESS CONTROL MECHANISMS, ETC.) AND TO PROVIDE AN AUDIT TRAIL (VIEWER LOGGING, MODIFICATION LOGGING, ETC.)? 19

5.0 DATA STORAGE, RETENTION AND DELETION 20

5.1 HOW WILL DATA BE SECURELY STORED? 20

5.2 HOW WILL THE OWNER ALLOW FOR DEPARTMENTAL AND OTHER ENTITIES, TO AUDIT FOR COMPLIANCE WITH LEGAL DELETION REQUIREMENTS? 20

5.3 WHAT MEASURES WILL BE USED TO DESTROY IMPROPERLY COLLECTED DATA? 20

6.0 DATA SHARING AND ACCURACY 21

6.1 WHICH ENTITY OR ENTITIES INSIDE AND EXTERNAL TO THE CITY WILL BE DATA SHARING PARTNERS? 21

6.2 WHY IS DATA SHARING NECESSARY? 21

6.3 ARE THERE ANY RESTRICTIONS ON NON-CITY DATA USE? 21

6.4 HOW DOES THE PROJECT/TECHNOLOGY REVIEW AND APPROVE INFORMATION SHARING AGREEMENTS, MEMORANDUMS OF UNDERSTANDING, NEW USES OF THE INFORMATION, NEW ACCESS TO THE SYSTEM BY ORGANIZATIONS WITHIN CITY OF SEATTLE AND OUTSIDE AGENCIES? 21

DRAFT

6.6 DESCRIBE ANY PROCEDURES THAT ALLOW INDIVIDUALS TO ACCESS THEIR INFORMATION AND CORRECT INACCURATE OR ERRONEOUS INFORMATION. 22

7.0 LEGAL OBLIGATIONS, RISKS AND COMPLIANCE 22

7.1 WHAT SPECIFIC LEGAL AUTHORITIES AND/OR AGREEMENTS PERMIT AND DEFINE THE COLLECTION OF INFORMATION BY THE PROJECT/TECHNOLOGY? 22

8.0 MONITORING AND ENFORCEMENT 24

FINANCIAL INFORMATION 26

PURPOSE 26

1.0 FISCAL IMPACT 26

1.1 CURRENT OR POTENTIAL SOURCES OF FUNDING: INITIAL ACQUISITION COSTS 26

1.2 CURRENT OR POTENTIAL SOURCES OF FUNDING: ON-GOING OPERATING COSTS, INCLUDING MAINTENANCE, LICENSING, PERSONNEL, LEGAL/COMPLIANCE USE AUDITING, DATA RETENTION AND SECURITY COSTS. 26

1.3 COST SAVINGS POTENTIAL THROUGH USE OF THE TECHNOLOGY 27

1.4 CURRENT OR POTENTIAL SOURCES OF FUNDING INCLUDING SUBSIDIES OR FREE PRODUCTS OFFERED BY VENDORS OR GOVERNMENTAL ENTITIES 27

EXPERTISE AND REFERENCES 28

PURPOSE 28

1.0 OTHER GOVERNMENT REFERENCES 28

2.0 ACADEMICS, CONSULTANTS, AND OTHER EXPERTS 29

3.0 WHITE PAPERS OR OTHER DOCUMENTS 30

RACIAL EQUITY TOOLKIT AND ENGAGEMENT FOR PUBLIC COMMENT WORKSHEET 31

PURPOSE 31

ADAPTION OF THE RET FOR SURVEILLANCE IMPACT REPORTS 31

RACIAL EQUITY TOOLKIT OVERVIEW 31

RACIAL EQUITY TOOLKIT: TO ASSESS POLICIES, INITIATIVES, PROGRAMS, AND BUDGET ISSUES 31

1.0 SET OUTCOMES 32

DRAFT

1.1. SEATTLE CITY COUNCIL HAS DEFINED THE FOLLOWING INCLUSION CRITERIA IN THE SURVEILLANCE ORDINANCE, AND THEY SERVE AS IMPORTANT TOUCHSTONES FOR THE RISKS DEPARTMENTS ARE BEING ASKED TO RESOLVE AND/OR MITIGATE. WHICH OF THE FOLLOWING INCLUSION CRITERIA APPLY TO THIS TECHNOLOGY? 32

1.2 WHAT ARE THE POTENTIAL IMPACTS ON CIVIL LIBERTIES THROUGH THE IMPLEMENTATION OF THIS TECHNOLOGY? 32

1.3 WHAT DOES YOUR DEPARTMENT DEFINE AS THE MOST IMPORTANT RACIALLY EQUITABLE COMMUNITY OUTCOMES RELATED TO THE IMPLEMENTATION OF THIS TECHNOLOGY? 32

1.4 WHAT RACIAL EQUITY OPPORTUNITY AREA(S) WILL BE AFFECTED BY THE APPLICATION OF THE TECHNOLOGY? 32

1.5 ARE THERE IMPACTS ON: 32

2.0 INVOLVE STAKEHOLDERS, ANALYZE DATA 33

2.4 WHAT DOES DATA AND CONVERSATIONS WITH STAKEHOLDERS TELL YOU ABOUT EXISTING RACIAL INEQUITIES THAT INFLUENCE PEOPLE'S LIVES AND SHOULD BE TAKEN INTO CONSIDERATION WHEN APPLYING/IMPLEMENTING/USING THE TECHNOLOGY? 36

2.5 WHAT ARE THE ROOT CAUSES OR FACTORS CREATING THESE RACIAL INEQUITIES? 36

3.0 DETERMINE BENEFIT AND/OR BURDEN 36

3.1 HOW WILL THE TECHNOLOGY, OR USE OF THE TECHNOLOGY INCREASE OR DECREASE RACIAL EQUITY? 36

3.2 WHAT BENEFITS TO THE IMPACTED COMMUNITY/DEMOGRAPHIC MAY RESULT? 37

3.3 WHAT ARE POTENTIAL UNINTENDED CONSEQUENCES (BOTH NEGATIVE AND POSITIVE POTENTIAL IMPACT)? 37

3.4 ARE THE IMPACTS ALIGNED WITH YOUR DEPARTMENT'S COMMUNITY OUTCOMES THAT WERE DEFINED IN STEP 1.0? 37

4.0 ADVANCE OPPORTUNITY OR MINIMIZE HARM 37

4.1 HOW WILL YOU ADDRESS THE IMPACTS (INCLUDING UNINTENDED CONSEQUENCES) ON RACIAL EQUITY? 37

5.0 EVALUATE, RAISE RACIAL AWARENESS, BE ACCOUNTABLE 38

5.1 WHICH NEIGHBORHOODS WERE IMPACTED/TARGETED BY THE TECHNOLOGY OVER THE PAST YEAR AND HOW MANY PEOPLE IN EACH NEIGHBORHOOD WERE IMPACTED? 38

5.2 DEMOGRAPHIC INFORMATION OF PEOPLE IMPACTED/TARGETED BY THE TECHNOLOGY OVER THE PAST YEAR. 38

5.3 WHICH OF THE MITIGATION STRATEGIES THAT YOU IDENTIFIED IN STEP 4 WERE IMPLEMENTED IN THE PAST YEAR? 39

DRAFT

5.4 HOW HAVE YOU INVOLVED STAKEHOLDERS SINCE THE IMPLEMENTATION/APPLICATION OF THE TECHNOLOGY BEGAN? 39

5.5 WHAT IS UNRESOLVED? WHAT RESOURCES/PARTNERSHIPS DO YOU STILL NEED TO MAKE CHANGES? 39

6.0 REPORT BACK 40

PRIVACY AND CIVIL LIBERTIES ASSESSMENT 41

PURPOSE 41

WORKING GROUP PRIVACY AND CIVIL LIBERTIES ASSESSMENT 41

APPENDIX A: GLOSSARY 42

APPENDIX B: PUBLIC COMMENT DEMOGRAPHICS AND ANALYSIS 44

OVERVIEW OF PUBLIC COMMENT ANALYSIS 44

COMMENTS SPECIFICALLY ADDRESSING CCTV TRAFFIC CAMERAS 45

DEMOGRAPHICS FOR GROUP ONE COMMENTS 49

APPENDIX C: PUBLIC MEETING NOTICE(S) 50

APPENDIX D: MEETING SIGN-IN SHEET(S) 58

APPENDIX E: ALL INDIVIDUAL COMMENTS RECEIVED 73

ALL COMMENTS RECEIVED ON LPR 73

ALL COMMENTS RECEIVED ON GENERAL SURVEILLANCE 84

APPENDIX F: LETTERS FROM ORGANIZATIONS 122

APPENDIX G: EMAILS & LETTERS FROM THE PUBLIC 134

APPENDIX H: PUBLIC COMMENT ANALYSIS METHODOLOGY 140

OVERVIEW 140

DRAFT

BACKGROUND ON METHODOLOGICAL FRAMEWORK 140
METHODOLOGY 140
STEP ONE: PREPARE DATA 140
STEP TWO: CONDUCT QUALITATIVE ANALYSIS USING FRAMEWORK METHODOLOGY 141
STEP THREE: CONDUCT QUANTITATIVE ANALYSIS 141
STEP FOUR: SUMMARIZATION 141
APPENDIX I: CTO NOTICE OF SURVEILLANCE TECHNOLOGY 142

DRAFT

SURVEILLANCE IMPACT REPORT OVERVIEW

The Seattle City Council passed Ordinance 125376, also referred to as the "Surveillance Ordinance", on September 1, 2017. This Ordinance has implications for the acquisition of new technologies by the City, and technologies that are already in use that may fall under the new, broader definition of surveillance.

SMC 14.18.020.B.1 charges the City's Executive with developing a process to identify surveillance technologies subject to the Ordinance. Seattle IT, on behalf of the Executive, developed and implemented a process through which a privacy and surveillance review is completed prior to the acquisition of new technologies. This requirement, and the criteria used in the review process, are documented in Seattle IT Policy PR-02, the "Surveillance Policy".

HOW THIS DOCUMENT IS COMPLETED

As Seattle IT and department staff complete the document, they should keep the following in mind.

- Responses to questions should be in the text or check boxes only; all other information (questions, descriptions, etc.) should **NOT** be edited by the department staff completing this document.
- All content in this report will be available externally to the public. With this in mind, avoid using acronyms, slang, or other terms which may not be well-known to external audiences. Additionally, responses should be written using principally non-technical language to ensure they are accessible to audiences unfamiliar with the topic.

DRAFT

PRIVACY IMPACT ASSESSMENT

PURPOSE

A Privacy Impact Assessment ("PIA") is a method for collecting and documenting detailed information collected in order to conduct an in-depth privacy review of a program or project. A PIA asks questions about the collection, use, sharing, security and access controls for data that is gathered using a technology or program. It also requests information about policies, training and documentation that govern use of the technology. The PIA responses are used to determine privacy risks associated with a project and mitigations that may reduce some or all of those risks. In the interests of transparency about data collection and management, the City of Seattle has committed to publishing all PIAs on an outward facing website for public access.

WHEN IS A PRIVACY IMPACT ASSESSMENT REQUIRED?

A PIA may be required in two circumstances.

1) When a project, technology, or other review has been flagged as having a high privacy risk.
2) When a technology is required to complete the Surveillance Impact Report process. This is one deliverable that comprises the report.

1.0 ABSTRACT

1.1 Please provide a brief description (one paragraph) of the purpose and proposed use of the project/technology.

Traffic Cameras play a major role in Seattle's Intelligent Transportation System and Traffic Incident Management programs. The Seattle Department of Transportation (SDOT) has cameras installed throughout the city to monitor congestion, incidents, closures, and other traffic issues. The ability to see the roads provide SDOT's engineers with the necessary information to detect and quickly respond to traffic issues which leads to decreased travel delay, improved public health and safety, local economic vitality, energy savings, public safety resources, and citizen satisfaction with government services.

DRAFT

1.2 Explain the reason the project/technology is being created or updated and why the PIA is required.

Traffic Cameras meet two inclusion criteria from the PR-02 Surveillance Policy:

1. There is a possibility that personally identifiable information will be shared with non-City entities that will use the data for a purpose other than providing the City with a contractually agreed-upon service.
2. The technology collects data that is personally identifiable even if obscured, de-identified, or anonymized after collection.

2.0 PROJECT / TECHNOLOGY OVERVIEW

Provide an overview of the project or technology. The overview gives the context and background necessary to understand the purpose, mission and justification for the project / technology proposed

2.1 Describe the benefits of the project/technology.

SDOT operates an extensive network of 210 Traffic Cameras across Seattle to help our Transportation Operations Center (TOC) detect and quickly respond to congestion, incidents, and other problems on the roads. The ability to observe traffic conditions across the City in real-time is a primary component of SDOT's Traffic Incident Management (TIM) program. TIM consists of a planned and coordinated multi-disciplinary process to detect, respond to, and clear traffic incidents so that traffic flow may be restored as safely and quickly as possible. Effective TIM reduces the duration and impacts of traffic incidents and improves the safety of motorists, crash victims and emergency responders.

The live streaming video from each of these cameras is also accessible to the public on our Traveler Information Map, and used by other city departments to understand current traffic conditions. The majority of workers surveyed in Seattle and Los Angeles indicated that they used the Internet to obtain traffic information for their commute trip (FHWA, 2005).

(Federal Highway Administration (FHWA), United States Department of Transportation (USDOT), 2005).

2.2 Provide any data or research demonstrating anticipated benefits.

Traffic Incident Management (TIM) consists of a planned and coordinated multi-disciplinary process to detect, respond to, and clear traffic incidents so that traffic flow may be restored as safely and quickly as possible. Effective TIM reduces the duration and impacts of traffic incidents and improves the safety of motorists, crash victims and emergency responders. This coordinated process involves a number of public and private sector partners, including

- Transportation
- Law Enforcement
- Fire and Rescue
- Emergency Medical Services
- Public Safety Communications
- Emergency Management
- Towing and Recovery
- Hazardous Materials Contractors
- Traffic Information Media

The TIM Program of the Federal Highway Administration (FHWA) is part of a larger all-hazards program called Emergency Transportation Operations (ETO).

According to FHWA Report HOP-10-050 titled *Best Practices in Traffic Incident Management*, "Detection and verification are the first steps in the TIM process. Detection is the determination that an incident of some type has occurred. Incidents may be detected in person by motorists or response personnel or automatically using electronic loop detectors and associated incident detection algorithms. Verification is the determination of the precise location and nature of the incident. Accurate and detailed information about the incident can help to ensure that the most appropriate personnel and resources are dispatched to the scene. Verification can be accomplished in the field utilizing on-site response personnel or remotely using CCTV (Traffic Cameras). Effective incident detection and verification can improve access to the scene for incident responders; support appropriate personnel and equipment dispatch to the scene, improve responder safety by alerting them to potentially dangerous conditions at the scene (i.e., fire or hazardous materials), reduce secondary incidents, and save lives by ensuring that vehicle crashes are detected on low-traffic roadways" (Carson, 2010).

TIM Best Practices FHWA.pdf

2.3 Describe the technology involved.

A Traffic Camera is a dedicated video camera which observes vehicular traffic on the road. In Seattle, these are installed along most major arterials, and are typically mounted on traffic poles at signalized intersections. The cameras communicate using SDOT's fiber-optic ITS network, and each typically receives power from the nearest traffic signal cabinet. The Transit Operations Center (TOC) receives the live video in real time and distributes information if there is a traffic collision or some other disruptive incident or road safety issue. The cameras are remotely controllable (full pan, tilt, and zoom) allowing operators to accurately maneuver cameras to best understand traffic conditions in the area. The video produced from newer models of cameras is in HD, enabling the observation of traffic from even great distances. The cameras are powered and providing video 24x7 unless there is a technical issue at a specific site.

SDOT has linked their camera network to the Internet using the Traveler Information Map, thus allowing commuters to view current live traffic conditions. The website shows both streaming video and still imagery which refreshes at a set interval of 1 minute, helping travelers determine whether an alternate route should be taken. These traffic images are combined with congestion information, travel times, bridge opening notifications, and other alerts to provide a full picture of traffic conditions in Seattle.

Traffic Cameras are different from red light running camera (which are put in specific places to enforce rules of the road), as Traffic Cameras are strictly used for traffic observation.

2.4 Describe how the project or use of technology relates to the department's mission.

SDOT's mission is to deliver a high-quality transportation system for Seattle. Traffic Cameras play a vital role in reducing delay and congestion by giving engineers the opportunity to observe current traffic conditions throughout the city. This information allows the team to send messages to the public on roadside signs, Twitter, and the Traveler Information map so they can make more informed trip decisions. During traffic incidents, this situational awareness additionally allows engineers to modify traffic signal timing to better move vehicles along identified detour routes.

Traffic Cameras also give SDOT's TOC the ability to identify stalled vehicles and dispatch dedicated trucks that are equipped with tools to help get the vehicle moving again, or to help maneuver it out of the way to allow other traffic to continue unimpeded. According to the National Traffic Incident Management Coalition, "Traffic incidents account for about one-quarter of all congestion on U.S. roadways. For every minute that travel lane is blocked during a peak travel period, four minutes of travel delay results after the incident is cleared. Reduced incident-related travel delay is a key benefit of TIM programs."

2.5 Who will be involved with the deployment and use of the project / technology?

Traffic cameras are installed by either qualified SDOT personnel, or authorized electrical contractors associated with a project. Installation locations are identified by determining where there are gaps in observational coverage along corridors specified in the Intelligent Transportation System (ITS) Strategic Plan 2010-2020. This plan provides a 10-year approach for implementing ITS in Seattle. ITS employs electronics and communications technologies on the street, and automated traffic systems, to enhance mobility for all modes by increasing the efficiency and safety of the transportation infrastructure. This includes implementing traffic cameras citywide to improve the response to outages and incidents.

The ITS Key Arterial Network is not fully instrumented to provide the desired ITS systems and services. The devices deployed will depend upon the state of equipment already in place, and the specific needs of each corridor and subarea. Deployment will include a mixture of technologies including communications and traffic cameras. Highest priority is assigned to locations which would experience impacts from major construction projects such as the SR 520 Bridge Replacement Project and the Alaskan Way Viaduct Replacement Project.

The primary users of SDOT's Traffic Cameras are users in the TOC. The TOC houses the central processing and communications systems for the ITS program, and is where operators monitor and manage traffic signals, traffic cameras, Dynamic Message Signs, and other ITS devices. The TOC systems also provide video images to City agencies and others that use them in emergency and incident management, as well as the Traveler Information website. The TOC staff responds to traffic incidents throughout Seattle and is part of the City's emergency response plans. The TOC is open 7 days a week from 6AM-10PM and responds overnight as needed in an on-call capacity.

ITSStrategicPlan20102020.pdf

3.0 USE GOVERNANCE

Provide an outline of any rules that will govern the use of the project / technology. Please note: non-City entities are bound by restrictions specified in the Surveillance Ordinance and Privacy Principles and must provide written procedures for how the entity will comply with any restrictions identified.

3.1 Describe the processes that are required prior to each use, or access to/ of the project / technology, such as a notification, or check-in, check-out of equipment.

Access to the camera control software (Cameleon) is managed by the TOC Technical Team who grant system privileges to individual users based on their operational needs. User authorization is password protected, and once a successful log-in occurs, the list of accessible cameras appears.

SDOT currently supports users of the software in the following departments or functional areas:

1. SDOT Transportation Operations Center
2. SDOT Street Maintenance Dispatch
3. SDOT Traffic Signal Shop
4. Seattle Emergency Operations Center
5. Seattle Mayor's Office
6. Seattle Fire Alarm Center
7. Seattle Police Operations Center

Camera control privileges are hierarchical, and the TOC operation maintains the highest priority. This means that if two users are attempting to maneuver the same camera simultaneously, the user with the highest priority maintains control. Video from each Traffic Camera is available live at any time to anyone in the public on the SDOT Traveler Information Map.

3.2 List the legal standards or conditions, if any, that must be met before the project / technology is used.

For example, the purposes of a criminal investigation are supported by reasonable suspicion.

Traffic cameras are not subject to any legal standards.

3.3 Describe the policies and training required of all personnel operating the project / technology, and who has access to ensure compliance with use and management policies.

SDOT has developed policies governing the use of Traffic Cameras by all personnel as stated below:

Prior to taking control of any SDOT CCTV camera, users MUST:

1) Notify the Transportation Operations Center (TOC) staff member at (206) 684-5117 (between the hours of 6:00 am – 10:00 pm daily) or 684-5122 at all other times.

   AND

2) Must comply with the RULES OF USE listed below.

USER PRIORITY:

SDOT traffic cameras are available to the public via both live feeds to the website (http://web6.seattle.gov/travelers/) and static images updated every minute. They are typically pointed in a direction, called the "home preset". Each camera will return to its home preset every five minutes of inactivity, unless it is locked by a user. Locking a camera will allow the user to maintain the camera view until it is unlocked and returned to its home preset, or a higher priority user takes control.

The SDOT TOC has the highest priority and can lock out other users (listed below) from taking control of the camera. When the CCTV camera is locked by the SDOT TOC, no other user has the ability to move it. If lower level users have a need of any SDOT CCTV camera, that user must contact the SDOT TOC (as listed above) and the CCTV may be released for their use (depending on the current use versus the requested use). NOTE: Control will be returned to the TOC at such time that an incident of a higher priority as determined by the SDOT TOC presents itself. The TOC will attempt to notify the lower level user.

RULES OF USE

Closed Circuit Television (CCTV) cameras implemented by SDOT are for the purposes of traffic management, incident management and response, and public information. CCTV cameras and images are used in a manner consistent with the public's expectation of privacy, while serving their function as a traffic management and traveler information tool.

In order to implement these policies, SDOT has created the following rules:

- CCTVs shall be used to monitor conditions on SDOT-owned roadways, and shall not be used to monitor conditions on the sidewalk or on private property.
- Operator shall not use the CCTV cameras to zoom in close enough to discern any information that would enable the operators to identify a member of the public, including, without limitation, license plate numbers, unless doing so is absolutely necessary to allow the operator to perform a vital component of their jobs.
- Should it be necessary to view personally-identifiable information, the operator shall terminate any dissemination of the CCTV feed to the general public prior to viewing such information, and shall not resume dissemination until personally-identifiable information is no longer visible.

3.3 Continued…

- Video images will not be recorded, except for compelling traffic operational needs. If they are recorded, any such recordings will be destroyed immediately after use. Recordings shall not be stored or disseminated.
- Subject to these limitations, SDOT may disseminate images or video streams over its web page

According to a 2016 study published by the FHWA titled Transportation Management Center Video Recording and Archiving Best General Practices, the procedure outlined in policy #2 is as recommended. "For sensitive situations, have the capability to cut feeds to the public/media while preserving them to transportation agencies and emergency responders. If not possible, have a camera use policy which includes not zooming into personally identifiable details" (FHWA, 2016).

SDOT Camera Control Protocol.pdf

4.0 DATA COLLECTION AND USE

Provide information about the policies and practices around the collection and use of the data collected.

4.1 Provide details about what information is being collected from sources other than an individual, including other IT systems, systems of record, commercial data aggregators, publicly available data and/or other city departments.

No other data is collected as part of our Traffic Camera program.

4.2 What measures are in place to minimize inadvertent or improper collection of data?

Video is not archived except in specific scenarios when it has been requested by qualified City personnel who have been tasked with completing an assignment where the observation of traffic would aid in a successful outcome. Examples of this include: the monitoring the effects of a change in traffic signal timing, observing the traffic impacts of a special event to better prepare for similar occurrences in the future, or observing traffic after a channelization change has been made to confirm that vehicles are able to make safe movements. In those instances, all video is destroyed within 10 days of collection. All users are trained not to intentionally position cameras in a manner where license plates or people can be individually discerned, and to only use the cameras as a tool to observe traffic conditions along a street.

4.3 How and when will the project / technology be deployed or used? By whom? Who will determine when the project / technology is deployed and used?

Traffic cameras are installed by either qualified SDOT personnel, or authorized electrical contractors associated with a project. Installation locations are identified by determining where there are gaps in observational coverage along corridors specified in the Intelligent Transportation System (ITS) Strategic Plan 2010-2020. This plan provides a 10-year approach for implementing ITS in Seattle. ITS employs electronics and communications technologies on the street, and automated traffic systems, to enhance mobility for all modes by increasing the efficiency and safety of the transportation infrastructure. This includes implementing traffic cameras citywide to improve the response to outages and incidents.

The ITS Key Arterial Network is not fully instrumented to provide the desired ITS systems and services. The devices deployed will depend upon the state of equipment already in place, and the specific needs of each corridor and subarea. Deployment will include a mixture of technologies including communications and traffic cameras. Highest priority is assigned to locations which would experience impacts from major construction projects such as the SR 520 Bridge Replacement Project and the Alaskan Way Viaduct Replacement Project.

The primary users of SDOT's Traffic Cameras are users in the Transportation Operations Center (TOC). The TOC houses the central processing and communications systems for the ITS program, and is where operators monitor and manage traffic signals, traffic cameras, Dynamic Message Signs, and other ITS devices. The TOC systems also provide video images to City agencies and others that use them in emergency and incident management, as well as the Traveler Information website. The TOC staff responds to traffic incidents throughout Seattle and is part of the City's emergency response plans. The TOC is open 7 days a week from 6AM-10PM and responds overnight as needed in an on-call capacity.

ITSStrategicPlan20102020.pdf

4.4 How often will the technology be in operation?

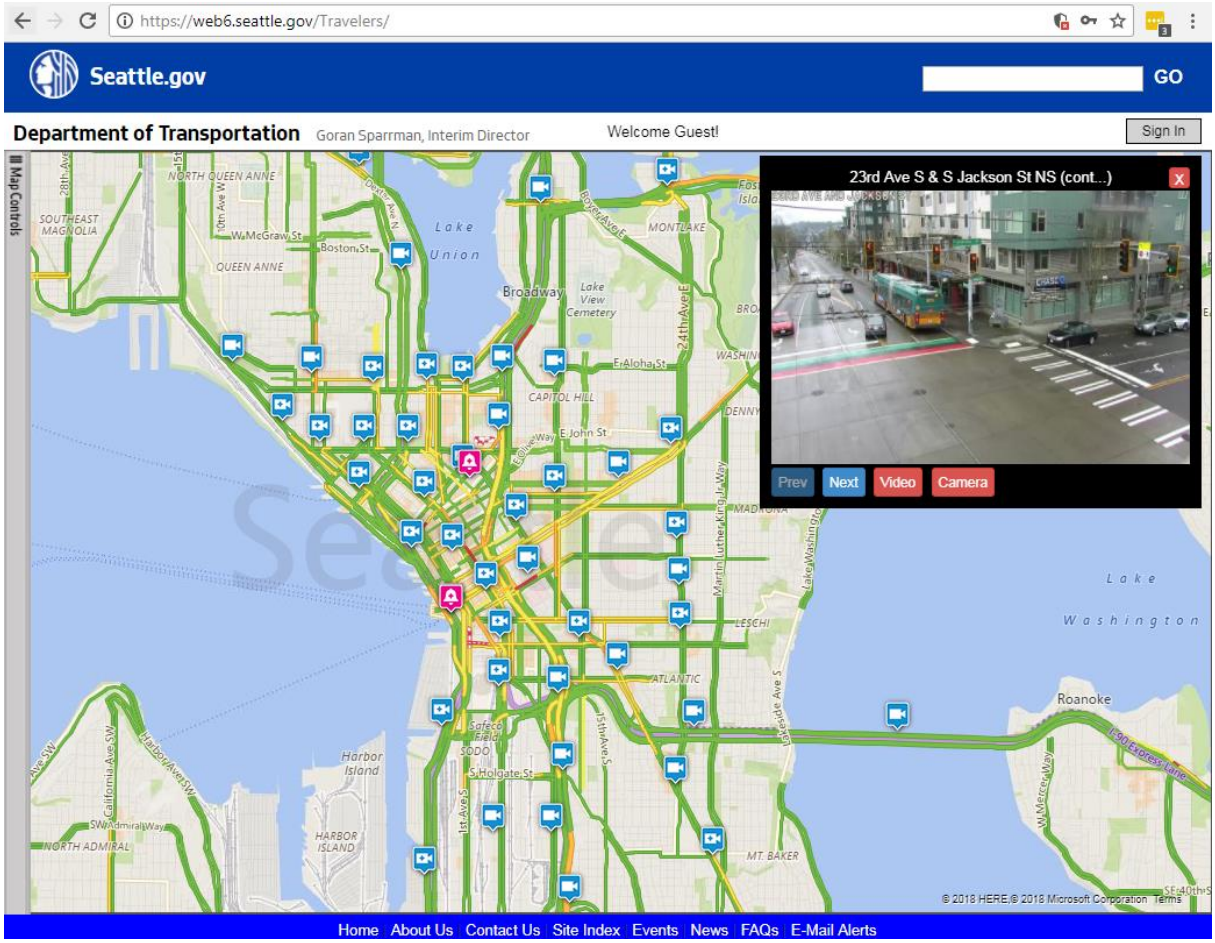
Traffic cameras are powered and providing streaming video 24 hours a day and 365 days a year.

4.5 What is the permanence of the installation? Is it installed permanently, or temporarily?

Traffic cameras are installed permanently.

4.6 Is a physical object collecting data or images visible to the public? What are the markings to indicate that it is in use? What signage is used to determine department ownership and contact information?

Traffic Cameras are clearly visible to the public as they're installed on traffic signal poles or mast arms. There is nothing that would indicate a camera is in use unless it's maneuvered (pan or tilt) while being observed. There is no signage indicating department ownership and contact information in the field. But the footage from each camera is available anytime to the public on SDOT's [Traveler Information Map](). A user has the option to select any Traffic Camera from the map. Once selected, the user is presented with a still image from the location which is updated every minute. The user then has the option to select "Video" from the camera and watch a live-stream which will run until the window is closed. This is a screen capture of that interface:



4.7 How will data that is collected be accessed and by whom?

SDOT currently supports real-time camera control users in the following departments or functional areas:

1. SDOT Transportation Operations Center
2. SDOT Street Maintenance Dispatch
3. SDOT Traffic Signal Shop
4. Seattle Emergency Operations Center
5. Seattle Mayor's Office
6. Seattle Fire Alarm Center
7. Seattle Police Operations Center

Per the SDOT Camera Control Policy, the SDOT Transportation Operations Center (TOC) has the highest priority and can lock out other users (listed above) from taking control of the camera. When the traffic camera is locked by the SDOT TOC, no other user has the ability to move it. If lower level users have a need of any SDOT CCTV camera, that user must contact the SDOT TOC and the CCTV may be released for their use (depending on the current use versus the requested use). NOTE: Control will be returned to the TOC at such time that an incident of a higher priority as determined by the SDOT TOC presents itself. The TOC will attempt to notify the lower level user.

Closed Circuit Television (CCTV) cameras implemented by SDOT are for the purposes of traffic management, incident management and response, and public information. CCTV cameras and images are used in a manner consistent with the public's expectation of privacy, while serving their function as a traffic management and traveler information tool.

Traffic Camera video recordings used for engineering studies (destroyed after 10 days) may be accessed by employees performing these roles:

1. Transportation Center Operators
2. Traffic Signal Timing Engineers
3. Traffic Signal Design Engineers

4.8 If operated or used by another entity on behalf of the City, provide details about access, and applicable protocols. Please link memorandums of agreement, contracts, etc. that are applicable.

Traffic Cameras are not operated by another entity on behalf of the City, but SDOT does support users in other departments as listed in 4.7. The public has unlimited access to streaming video from any Traffic Camera by visiting the Traveler Information Map.

4.9 What are acceptable reasons for access to the equipment and/or data collected?

Traffic cameras may be remotely controlled or otherwise accessed for these reasons:

- To perform general monitoring of traffic conditions in Seattle
- To discern the extent of traffic impacts in the City after an unplanned incident has occurred
- To understand the impact of planned events (construction, concerts, stadium events) on the City's traffic
- To perform remote maintenance and troubleshooting

4.10 What safeguards are in place, for protecting data from unauthorized access (encryption, access control mechanisms, etc.) and to provide an audit trail (viewer logging, modification logging, etc.)?

Cameras can only be repositioned by authorized users of SDOT's Cameleon ITS control software application. User access is managed by the TOC Technical Team, and the software must be installed and remain updated on each client computer to function. Users are granted access to certain devices and control privileges based on the needs of their specific role. To select and move a camera, the software must be installed on a client computer, and that client computer must be identified in the Cameleon server. A user must log into the system using the correct user and password combination. Users are members of groups in Cameleon, and groups are assigned priority and access privileges within the software. Every user has the opportunity to control any camera in SDOT's current configuration, but prioritization has been assigned to determine who will be granted control if two or more users are trying to reposition the same camera simultaneously. This is how that privilege hierarchy is structured from highest priority to lowest:

1. SDOT TOC Technology Team (System Administrators)
2. SDOT Transportation Operations Center
3. SDOT Street Maintenance Dispatch
4. Seattle Police Operations Center
5. Seattle Fire Alarm Center
6. Seattle Emergency Operations Center
7. SDOT Traffic Signal Shop
8. Seattle Mayor's Office

Each successful log in is stored in the Cameleon archive server database. Each camera can also be accessed directly through a built-in web interface, which is also protected by a user and password combination only know to the TOC Technical Team. This method of access is strictly used to initially configure the cameras, perform firmware upgrades, or perform other troubleshooting measures.

5.0 DATA STORAGE, RETENTION AND DELETION

5.1 How will data be securely stored?

Video recordings used for engineering studies are stored on a shared network drive accessible only by City personnel. Additionally, the files are kept in a folder which has specific security permissions to only allow the intended viewer access to the footage.

Per SDOT's Use Policy outlined in section 3.3 of this document, all recordings will be destroyed immediately after use. Recordings shall not be stored or disseminated.

5.2 How will the owner allow for departmental and other entities, to audit for compliance with legal deletion requirements?

According to the attached SDOT Records Retention Schedule, traffic camera video recordings are not subject to any legal deletion requirements. For informational purposes, all other SDOT data retention requirements are provided in the document below.

SDOT Records Retention Schedule.pc

5.3 What measures will be used to destroy improperly collected data?

All archived files are permanently deleted within 10 days, and all camera operators are trained on the usage policy which states, "Authorized CCTV users shall not use the CCTV cameras to zoom in close enough to discern any information that would enable identification of a member of the public, including, without limitation, license plate numbers, unless doing so is necessary to allow the operators to perform a vital component of their jobs." The SDOT usage policy is attached in section 3.3 of this document.

5.4 Which specific departmental unit or individual is responsible for ensuring compliance with data retention requirements?

There are no legal deletion requirements, but the TOC Technical Team is responsible for deleting any video file 10 days after the file's last "Date modified" value has been reached.

6.0 Data Sharing and Accuracy

6.1 Which entity or entities inside and external to the City will be data sharing partners?

Traffic Camera video recordings used for engineering studies (destroyed after 10 days) may be accessed by employees performing these roles:

- SDOT Transportation Center Operators
- SDOT Traffic Signal Timing Engineers
- SDOT Traffic Signal Design Engineers

Live Traffic Cameras can be viewed and controlled by users in the following groups:

- TOC Operators
- SDOT Radio Dispatchers
- Seattle Police Department
- Seattle Fire Department
- Emergency Operations Center
- SDOT Signal Electricians
- Executive Protection Unit

6.2 Why is data sharing necessary?

Video is not archived except in specific scenarios when it has been requested by qualified City personnel who have been tasked with completing an assignment where the observation of traffic movement would aid in a successful outcome. Examples of this include monitoring the effects of a change in traffic signal timing, observing the traffic impacts of a special event to better prepare for similar occurrences in the future, or observing traffic after a channelization change has been made to confirm that vehicles are able to make safe movements.

6.3 Are there any restrictions on non-City data use?

Yes ☐ No ☒

6.3.1 If you answered Yes, provide a copy of the department's procedures and policies for ensuring compliance with these restrictions.

N/A

6.4 How does the project/technology review and approve information sharing agreements, memorandums of understanding, new uses of the information, new access to the system by organizations within City of Seattle and outside agencies?

Please describe the process for reviewing and updating data sharing agreements.

No data sharing agreements exist, other than the usage policies stated in Section 3.3.

6.5 Explain how the project/technology checks the accuracy of the information collected. If accuracy is not checked, please explain why.

Temporary archived video used for engineering studies is the only data collected as part of the Traffic Camera program, and SDOT is not aware of any software tools that are part of the standard City PC build which could permanently alter that footage.

6.6 Describe any procedures that allow individuals to access their information and correct inaccurate or erroneous information.

No such procedures exist.

7.0 LEGAL OBLIGATIONS, RISKS AND COMPLIANCE

7.1 What specific legal authorities and/or agreements permit and define the collection of information by the project/technology?

No legal agreements exist defining the collection of information by Traffic Cameras.

DRAFT

7.2 Describe what privacy training is provided to users either generally or specifically relevant to the project/technology.

For example, police department responses may include references to the Seattle Police Manual.

SDOT has developed policies governing the use of Traffic Cameras by all personnel as stated below:

1. CCTVs (Traffic Cameras) shall be used to monitor conditions within publicly-owned right-of-way or other publicly-owned property and shall not be used to monitor conditions on private property. SDOT will establish camera control and viewing protocols for use by all authorized users. The SDOT Traffic Operations Center will retain the capability to temporarily or permanently remove control capability from users if it is determined that they are not in compliance with the established CCTV protocols, guidance and policy.
2. Authorized CCTV users shall not use the CCTV cameras to zoom in close enough to discern any information that would enable identification of a member of the public, including, without limitation, license plate numbers, unless doing so is necessary to allow the operators to perform a vital component of their jobs. Should necessary use of the CCTV result in the ability to view personally-identifiable information, or images that may be unsuitable for dissemination to the public, the authorized user shall terminate any dissemination of the CCTV feed to the general public prior to viewing such information and shall not resume dissemination until personally-identifiable or unsuitable images or information are no longer visible.
3. Video images shall not be recorded, except only for compelling SDOT traffic operations and traffic planning needs. Documented approval for such recording must be received from the SDOT Traffic Operations Manager, or their assigned proxy. If images are recorded, any such recordings will be used within ten business days of recording and destroyed immediately after use. In no case shall recordings be stored beyond this period. Access to recordings by SDOT-authorized persons shall be strictly managed to these requirements.
4. Subject to these limitations, SDOT may disseminate video images or live video streams over its web page.

SDOT Camera Control Protocol.pdf

7.3 Given the specific data elements collected, describe the privacy risks identified and for each risk, explain how it was mitigated. Specific risks may be inherent in the sources or methods of collection, or the quality or quantity of information included.

Please work with the Privacy Team to identify the specific risks and mitigations applicable to this project / technology.

The risks associated with SDOT's traffic cameras are related to capturing still images or video of an identifiable individual and or license plates. This risk is mitigated through training on SDOT's use policy requiring the following of camera operators:

"Authorized CCTV users shall not use the CCTV cameras to zoom in close enough to discern any information that would enable identification of a member of the public, including, without limitation, license plate numbers, unless doing so is necessary to allow the operators to perform a vital component of their jobs."

7.4 Is there any aspect of the project/technology that might cause concern by giving the appearance to the public of privacy intrusion or misuse of personal information?

Examples might include a push of information out to individuals that is unexpected and appears to be intrusive, or an engagement with a third party to use information derived from the data collected, that is not explained in the initial notification.

The aspect of the technology that might cause concern by giving the appearance to the public of privacy intrusion is that Traffic Cameras are inherently devices intended to grant users remote monitoring opportunities. Individuals might assume that the cameras are used to conduct surveillance other than traffic observation.

8.0 MONITORING AND ENFORCEMENT

8.1 Describe how the project/technology maintains a record of any disclosures outside of the department.

Public information requests are funneled to the appropriate staff member and tracked by SDOT administrative staff. As traffic camera footage is only recorded under rare circumstances for a specific purpose, and as it is only retained for ten days, SDOT does not release CCTV footage in response to a public disclosure request.

DRAFT

8.2 What auditing measures are in place to safeguard the information, and policies that pertain to them, as well as who has access to the audit data? Explain whether the project/technology conducts self-audits, third party audits or reviews.

SDOT conducts several self-auditing procedures to best ensure that the information produced by Traffic Cameras is safeguarded:

1. Cameras are set to typically point in a particular direction (called the home preset) that would best aid commuters who might access the video from the Internet to make trip planning decisions. Twice a day, TOC Operators review each camera to confirm that none have drifted from that position due to wind or vibration. If that has occurred, the TOC Operator will reposition the camera and again save the home preset.
2. On the same day each week, a member of the TOC Technical Team reviews the archived video recording files to determine if any new ones have been added, and to note the date for which they were last modified. That staff member will then delete the file once the 10 day threshold has been met.

DRAFT

FINANCIAL INFORMATION

PURPOSE

This section provides a description of the fiscal impact of the surveillance technology, as required by the Surveillance Ordinance.

1.0 FISCAL IMPACT

Provide a description of the fiscal impact of the project/technology by answering the questions below.

1.1 Current or potential sources of funding: initial acquisition costs

Current ☒ Potential ☐

Date of Initial Acquisition	Date of Go Live	Direct Initial Acquisition Cost	Professional Services for Acquisition	Other Acquisition Costs	Initial Acquisition Funding Source
2000	2000	Approximately $40k per site including labor and materials	N/A	N/A	Combination of a federal grant (SR-99 ITS) and the general fund

Notes:

None.

1.2 Current or potential sources of funding: on-going operating costs, including maintenance, licensing, personnel, legal/compliance use auditing, data retention and security costs.

Current ☐ Potential ☐

Annual Maintenance and Licensing	Legal/compliance, audit, data retention and other security costs	Department Overhead	IT Overhead	Annual Funding Source
$130,000 is allocated for annual Traffic Camera Maintenance	N/A	N/A	N/A	General fund

Notes:

None.

DRAFT

1.3 Cost savings potential through use of the technology

The National Traffic Incident Management Coalition published a white paper titled, *The Benefits of Traffic Incident Management* which states the following, "Traffic Incident Management (TIM) programs address issues that are of concern to the national public: congestion and travel delay, public health and safety, economic health, energy savings, public safety resources, responder safety, and citizen satisfaction with government services. By reducing travel delay, fuel consumption, emissions, and secondary incidents, TIM programs boost the national and regional economy. According to Texas Transportation Institute's (TTI's) *Urban Mobility Report 2005*, travel time value for each person-hour of travel was $13.45 in 2004; for trucks the value was $71.05. In 2004, trucks idled due to traffic delay (incident-related and other) cost the U.S. trucking industry 243 million hours, and cost $7.8 billion. The costs of travel delay drive up freight costs, which are passed on to consumers through product and commodity price increases."

TIM Benefits NTIMC.pdf

The Washington State Department of Transportation has also conducted research around the economic benefits of implementing a successful TIM program. From their website: "Blocking incidents, idling cars and late deliveries have a cost. WSDOT estimates that the efforts of its incident response teams saves the economy of Washington State more than $65 million per year in lost time and fuel."

"Incident Response Program." *Washington State Department of Transportation*, 17 Jan. 2018, http://www.wsdot.wa.gov/operations/incidentresponse/default.htm

1.4 Current or potential sources of funding including subsidies or free products offered by vendors or governmental entities

SDOT regularly applies for federal grant opportunities around the implementation of ITS.

EXPERTISE AND REFERENCES

PURPOSE

The following information is provided to ensure that Council has a group of experts to reference while reviewing the completed Surveillance Impact Report ("SIR"). Any individuals or agencies referenced must be made aware ahead of publication that their information has been included. All materials must be available for Council to access or review, without requiring additional purchase or contract.

1.0 OTHER GOVERNMENT REFERENCES

Please list any other government bodies that have implemented this technology and can speak to the implementation of this technology.

Agency, Municipality, etc.	Primary Contact	Description of Current Use
City of Bellevue, WA	Chris Long, City Traffic Engineer 425-452-6013 CLong@bellevuewa.gov	Bellevue Transportation Department leverages traffic cameras similar to SDOT
Washington State Department of Transportation	Morgan Balogh, WSDOT Traffic Engineer 206-410-0001 BALOGHM@wsdot.wa.gov	The Washington State Department of Transportation leverages traffic cameras similar to SDOT

DRAFT

2.0 ACADEMICS, CONSULTANTS, AND OTHER EXPERTS

Please list any experts in the technology under consideration, or in the technical completion of the service or function the technology is responsible for.

Agency, Municipality, etc.	Primary Contact	Description of Current Use
University of Washington	Mark Hallenbeck, Director of the Washington State Transportation Center (TRAC) 206-543-6261 tracmark@uw.edu	Much of Mark's research involves the collection, use, summarization, and reporting of data that describe transportation system use and performance, and then using that information to work with the public and decision makers as they make major transportation and land use investment decisions.
University of Washington	Yinhai Wang, Professor and Director of PacTrans and STAR Lab 206-616-2696 yinhai@uw.edu	Dr. Yinhai Wang is a professor in transportation engineering and the founding director of the Smart Transportation Applications and Research Laboratory (STAR Lab) at the University of Washington (UW). He also serves as director for Pacific Northwest Transportation Consortium (PacTrans), USDOT University Transportation Center for Federal Region 10 and visiting chair for the Traffic Information and Control Department at Harbin Institute of Technology.

DRAFT

3.0 WHITE PAPERS OR OTHER DOCUMENTS

Please list any authoritative publication, report or guide that is relevant to the use of this technology or this type of technology.

Title	Publication	Link
Best Practices in Traffic Incident Management	FHWA-HOP-10-050. September 2010. Sponsoring Agency: Emergency Transportation Operations, Office of Transportation Operations, Federal Highway Administration, 1200 New Jersey Avenue, SE Washington, DC 20590	TIM Best Practices FHWA.pdf
Transportation Management Center Video Recording and Archiving Best General Practices	FHWA-HOP-16-033. March 2016. Sponsoring Agency: U.S. Department of Transportation Federal Highway Administration 1200 New Jersey Avenue, SE Washington, DC 20590	FHWA CCTV Recording Best Practic
Benefits of Traffic Incident Management	National Traffic Incident Management Coalition. About.	TIM Benefits NTIMC.pdf

DRAFT

RACIAL EQUITY TOOLKIT AND ENGAGEMENT FOR PUBLIC COMMENT WORKSHEET

PURPOSE

Departments submitting a SIR are required to complete an adapted version of the Racial Equity Toolkit ("RET").

1. To provide a framework for the mindful completion of the Surveillance Impact Reports in a way that is sensitive to the historic exclusion of vulnerable and historically underrepresented communities. Particularly, to inform the public engagement efforts Departments will complete as part of the Surveillance Impact Report.
2. To highlight and mitigate any impacts on racial equity from the adoption and the use of the technology.
3. To highlight and mitigate any disparate impacts on individuals or vulnerable communities.
4. To fulfill the public engagement requirements of the Surveillance Impact Report.

ADAPTION OF THE RET FOR SURVEILLANCE IMPACT REPORTS

The RET was adapted for the specific use by the Seattle Information Technology Departments' ("Seattle IT") Privacy Team, the Office of Civil Rights ("OCR"), and Change Team members from Seattle IT, Seattle City Light, Seattle Fire Department, Seattle Police Department, and Seattle Department of Transportation.

RACIAL EQUITY TOOLKIT OVERVIEW

RACIAL EQUITY TOOLKIT: TO ASSESS POLICIES, INITIATIVES, PROGRAMS, AND BUDGET ISSUES

The vision of the Seattle Race and Social Justice Initiative is to eliminate racial inequity in the community. To do this requires ending individual racism, institutional racism and structural racism. The Racial Equity Toolkit lays out a process and a set of questions to guide the development, implementation and evaluation of policies, initiatives, programs, and budget issues to address the impacts on racial equity.

WHEN DO I USE THIS TOOLKIT?

Early. Apply the toolkit early for alignment with departmental racial equity goals and desired outcomes.

HOW DO I USE THIS TOOLKIT?

With inclusion. The analysis should be completed by people with different racial perspectives.

Step by step. The Racial Equity Analysis is made up of six steps from beginning to completion:

Please refer to the following resources available on the Office of Civil Rights' website here: Creating effective community outcomes; Identifying stakeholders & listening to communities of color; Data resources

DRAFT

1.0 SET OUTCOMES

1.1. Seattle City council has defined the following inclusion criteria in the surveillance ordinance, and they serve as important touchstones for the risks departments are being asked to resolve and/or mitigate. Which of the following inclusion criteria apply to this technology?

☐ The technology disparately impacts disadvantaged groups.

☒ There is a high likelihood that personally identifiable information will be shared with non-City entities that will use the data for a purpose other than providing the City with a contractually agreed-upon service.

☒ The technology collects data that is personally identifiable even if obscured, de-identified, or anonymized after collection.

☐ The technology raises reasonable concerns about impacts to civil liberty, freedom of speech or association, racial equity, or social justice.

1.2 What are the potential impacts on civil liberties through the implementation of this technology?

The aspect of the technology that might cause concern is that people may assume that the cameras are used to conduct personal surveillance, and not just for traffic observation.

1.3 What does your department define as the most important racially equitable community outcomes related to the implementation of this technology?

That all areas of Seattle are equally served by Traffic Cameras and their role in the City's Traffic Incident Management program. This includes:

1. Better traffic progression for travelers throughout Seattle
2. Positive environmental impact by decreasing emissions
3. Real time opportunities to make more informed trip decisions by accessing travel times from our roadside signs and the Traveler Information Web Map

1.4 What racial equity opportunity area(s) will be affected by the application of the technology?

☒ Education
☒ Community Development
☒ Health
☒ Environment
☐ Criminal Justice
☒ Jobs
☒ Housing
☐ Other

1.5 Are there impacts on:

☐ Contracting Equity
☒ Workforce Equity
☐ Other, please describe below:
☐ Immigrant and Refugee Access to Services
☐ Inclusive Outreach and Public Engagement

DRAFT

No additional impacts.

2.0 INVOLVE STAKEHOLDERS, ANALYZE DATA

2.1 Departmental conclusions about potential neighborhood impacts of the technology. Are the impacts on geographic areas? ☒ Yes ☐ No

Check all neighborhoods that apply *(see map of neighborhood boundaries in Appendix A: Glossary, under "Seattle Neighborhoods"):*

☐ All Seattle neighborhoods

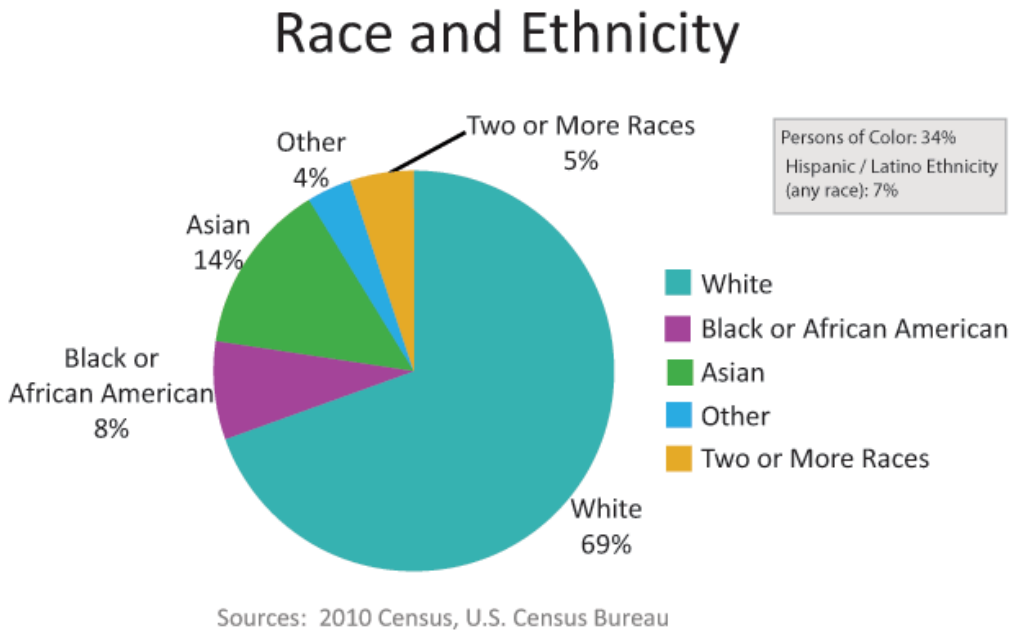
- ☒ Ballard
- ☒ North
- ☒ Northeast
- ☒ Central
- ☒ Lake Union
- ☒ Southwest
- ☒ Southeast
- ☐ Delridge
- ☒ Greater Duwamish
- ☒ East District
- ☐ King County (outside Seattle)

☐ Outside King County. Please describe:

N/A

2.2 What are the racial demographics of those living in the area or impacted by the issue? *(see Stakeholder and Data Resources* here*.)*

From Seattle's Office of Planning & Community Development, Race & Ethnicity Quick Statistics:



STOP: Department should complete RET questions 2.3 – 6 and Appendices B-I AFTER completing their public comment and engagement requirements.

2.3 Have you completed the following steps to engage the public? If you have not completed these steps, pause here until public outreach and engagement has been completed. (*See OCR's RET worksheet here for more information about engaging the public at this point in the process to ensure their concerns and expertise are part of analysis.*)

☒ **Create a public outreach plan.** Residents, community leaders, and the public were informed of the public meeting and feedback options via:

- ☒ Email
- ☐ Mailings
- ☐ Fliers
- ☒ Phone calls
- ☒ Social media
- ☐ Other

☒ The following community leaders were identified and invited to the public meeting(s):

- ☒ American Civil Liberties Union (ACLU)
- ☒ CARE
- ☒ Northwest Immigrant Rights
- ☒ OneAmerica
- ☒ JACL
- ☐ For Seattle Police Department only, Community Police Commissions
- ☒ Other:

[Please describe]

☒ **Engagement for Public Comment #1**

Date of meeting: 10/25/18

Location of meeting: American Legion Hall, West Seattle

Summary of discussion:

See Appendix B for an overview of comments received, and demographics on attendees. See Appendix E for the transcript of all comments received for this technology.

☒ **Engagement for Public Comment #2**

Date of meeting: 11/5/18

Location of meeting: Greenlake Branch Library

Summary of discussion:

DRAFT

See Appendix B for an overview of comments received, and demographics on attendees. See Appendix E for the transcript of all comments received for this technology.

☒ **Engagement for Public Comment #3 (if applicable)**

Date of meeting: Focus Groups: 11/8 & 11/20

Location of meeting: Byrd Barr Place; CID

Summary of discussion:

See Appendix B for an overview of comments received, and demographics on attendees. See Appendix E for the transcript of all comments received for this technology.

☒ **Collect public feedback via mail and email**

Number of feedback submissions received: 2

Summary of feedback: See Appendix B for an overview of comments received, and demographics on attendees. See Appendix E for the transcript of all comments received for this technology.

Open comment period: 10/8/18 – 11/5/18

☐ **Community Technology Advisory Board (CTAB) Presentation**

Date of presentation: N/A

Summary of comments:

N/A

DRAFT

2.4 What does data and conversations with stakeholders tell you about existing racial inequities that influence people's lives and should be taken into consideration when applying/implementing/using the technology?

(See OCR's RET worksheet here for more information; King County Opportunity Maps are a good resource for information based on geography, race, and income.)

In terms of technology installation, SDOT installs LPR and Traffic Cameras based on street transportation volumes and related technical criteria (e.g., based on gaps in travel time coverage along corridors specified in the SDOT ITS Strategic Plan). As this technology has been in place for a number of years, SDOT attended the DON-led focus groups, but community members in attendance did not raise traffic management technology as an issue for them. To the extent that LPR and Traffic Cameras provide people of color with additional traffic incident and congestion information, they benefit with this added data for improved transportation decisions. That said, outside of information on our dynamic message signs (fed by LPR data), much of the travelers information is internet or mobile based, so people without mobile phone or internet access may not be able to access SDOT Travelers Information data.

2.5 What are the root causes or factors creating these racial inequities?

Mitigation strategies will be addressed in 4.1 and 5.3. *Examples: bias in process; lack of access or barriers; lack of racially inclusive engagement.*

The response here focuses on people's access to mobile technology or Internet as a way to access SDOT transportation data. Based on research of others, possible reasons for not having a smartphone or credit card access are the financial barriers and people's lack of comfort with mobile technology. That said, SDOT's traffic cameras and travel volumes from LPR cameras are available data on large-scale traffic signs on key corridors for all to see, as well as these data are regularly used by news media for traffic reports.

3.0 DETERMINE BENEFIT AND/OR BURDEN

Provide a description of any potential disparate impact of surveillance on civil rights and liberties on communities of color and other marginalized communities. Given what you have learned from data and from stakeholder involvement…

3.1 How will the technology, or use of the technology increase or decrease racial equity?

What are potential unintended consequences? What benefits may result? Are the impacts aligned with your department's community outcomes that were defined in 1.0?

To the extent that LPR and Traffic Cameras provide people of color with additional traffic incident and congestion information, they benefit with this added data for improved transportation decisions. To the extent that minority-owned businesses are in the downtown or other areas with TOC technology, they and their customers may benefit from this improved traveler information.

3.2 What benefits to the impacted community/demographic may result?

Improved traffic flow, particularly in the Center City, as well as personal benefits people may experience including getting to their destination with less hassle, stress and on time.

3.3 What are potential unintended consequences (both negative and positive potential impact)?

To the extent that people are not able to access SDOT Travelers Information or are not aware of the SDOT information, they may find more difficulties with their commutes or they may avoid the downtown area if they are worried about the cameras. To the extent that the TC and LPR data lead to transportation infrastructure and investment in certain areas or for certain modes (autos) have the sense of perpetuating inequities or privilege for white communities.

3.4 Are the impacts aligned with your department's community outcomes that were defined in Step 1.0?

N/A

4.0 ADVANCE OPPORTUNITY OR MINIMIZE HARM

Provide a mitigation plan for the impacts described in step 3.

4.1 How will you address the impacts (including unintended consequences) on racial equity?

What strategies address immediate impacts? What strategies address root causes of inequity listed in 2.5? How will you partner with stakeholders for long-term positive change? If impacts are not aligned with desired community outcomes for surveillance technology (see 1a), how will you re-align your work?

Program Strategies:

SDOT will continue to improve our Transportation Operations Center performance and build out public awareness about traveler information.

Policy Strategies:

SDOT will continue to enforce personnel policies for the Transportation Operations Center to ensure that privacy principles are maintained.

Partnership Strategies:

SDOT will work with our partners (WSDOT, Seattle Police, Fire and emergency services) as well as media and others that access our LPR and Traffic Cameras to make sure that privacy principles are maintained.

5.0 EVALUATE, RAISE RACIAL AWARENESS, BE ACCOUNTABLE

The following information must be provided to the CTO, via the Privacy Office, on an annual basis for the purposes of an annual report to the City Council on the equitable use of surveillance technology. For Seattle Police Department, the equity impact assessments may be prepared by the Inspector General for Public Safety.

The following information does not need to be completed in the SIR submitted to Council, unless this is a retroactive review.

5.1 Which neighborhoods were impacted/targeted by the technology over the past year and how many people in each neighborhood were impacted?

☒ All Seattle neighborhoods
☐ Ballard
☐ North
☐ NE
☐ Central
☐ Lake Union
☐ Southwest
☐ Southeast
☐ Greater Duwamish
☐ East District
☐ King County (outside Seattle)
☐ Outside King County. Please describe:

N/A

5.2 Demographic information of people impacted/targeted by the technology over the past year.

To the best of the department's ability, provide demographic information of the persons surveilled by this technology. If any of the neighborhoods above were included, compare the surveilled demographics to the neighborhood averages and City averages.

The technology is deployed across the City measuring and providing travel times along most major travel corridors (determined by traffic volumes). Please see Section 2.2 regarding specific demographic information.

DRAFT

5.3 Which of the mitigation strategies that you identified in Step 4 were implemented in the past year?

Specifically, what adjustments to laws and policies should be made to remedy any disproportionate impacts so as to achieve a more equitable outcome in the future.

Type of Strategy (program, policy, partnership)	**Description of Strategy**	**Percent complete of implementation**	**Describe successes and challenges with strategy implementation**
Program	Continue to improve performance and public awareness about traveler information	Approximately 11% of the Prioritized ITS Projects have been funded	We perpetually look for opportunities to leverage technology to better move all people (regardless of mode) around the City
Policy	Ensure that privacy principles are maintained by SDOT staff	100%	We make mindful hiring decisions and conduct background checks as required, provide structured training that includes our privacy principles and provide staff supervision to ensure those principles are adhered to
Partnership	Ensure privacy principles are maintained by strategic partners	100%	Make partners aware of the City's privacy principles and create agreements regarding their adherence

5.4 How have you involved stakeholders since the implementation/application of the technology began?

☒ Public Meeting(s)
☐ CTAB Presentation
☒ Postings to Privacy webpage seattle.gov/privacy
☒ Other external communications
☐ Stakeholders have not been involved since the implementation/application

5.5 What is unresolved? What resources/partnerships do you still need to make changes?

N/A

DRAFT

6.0 REPORT BACK

Responses to Step 5 will be compiled and analyzed as part of the CTO's Annual Report on Equitable Use of Surveillance Technology.

Departments will be responsible for sharing their own evaluations with department leadership, Change Team Leads, and community leaders identified in the public outreach plan (Step 2c).

DRAFT

PRIVACY AND CIVIL LIBERTIES ASSESSMENT

PURPOSE

This section shall be completed after public engagement has concluded and the department has completed the Racial Equity Toolkit section above. The Privacy and Civil Liberties Assessment is completed by the Community Surveillance Working Group ("Working Group"), per the Surveillance Ordinance which states that the Working Group shall:

> "*[p]rovide to the Executive and the City Council a privacy and civil liberties impact assessment for each SIR that must be included with any departmental request for surveillance technology acquisition or in-use approval. The impact assessment shall include a description of the potential impact of the surveillance technology on civil rights and liberties and potential disparate impacts on communities of color and other marginalized communities. The CTO shall share with the Working Group a copy of the SIR that shall also be posted during the period of public engagement. At the conclusion of the public engagement period, the CTO shall share the final proposed SIR with the Working Group at least six weeks prior to submittal of the SIR to Council for approval. The Working Group shall provide its impact assessment in writing to the Executive and the City Council for inclusion in the SIR within six weeks of receiving the final proposed SIR. If the Working Group does not provide the impact assessment before such time, the Working Group must ask for a two-week extension of time to City Council in writing. If the Working Group fails to submit an impact statement within eight weeks of receiving the SIR, the department and City Council may proceed with ordinance approval without the impact statement."*

WORKING GROUP PRIVACY AND CIVIL LIBERTIES ASSESSMENT

[Assessment to be placed here.]

DRAFT

APPENDIX A: GLOSSARY

Accountable: (Taken from the Racial Equity Toolkit.) Responsive to the needs and concerns of those most impacted by the issues you are working on, particularly to communities of color and those historically underrepresented in the civic process.

Community Outcomes: (Taken from the Racial Equity Toolkit.) The specific result you are seeking to achieve that advances racial equity.

Contracting Equity: (Taken from the Racial Equity Toolkit.) Efforts to achieve equitable racial outcomes in the way the City spends resources, including goods and services, consultants and contracting.

DON: "Department of Neighborhoods."

Immigrant and Refugee Access to Services: (Taken from the Racial Equity Toolkit.) Government services and resources are easily available and understandable to all Seattle residents, including non-native English speakers. Full and active participation of immigrant and refugee communities exists in Seattle's civic, economic and cultural life.

Inclusive Outreach and Public Engagement: (Taken from the Racial Equity Toolkit.) Processes inclusive of people of diverse races, cultures, gender identities, sexual orientations and socio-economic status. Access to information, resources and civic processes so community members can effectively engage in the design and delivery of public services.

Individual Racism: (Taken from the Racial Equity Toolkit.) Pre-judgment, bias, stereotypes about an individual or group based on race. The impacts of racism on individuals including white people internalizing privilege, and people of color internalizing oppression.

Institutional Racism: (Taken from the Racial Equity Toolkit.) Organizational programs, policies or procedures that work to the benefit of white people and to the detriment of people of color, usually unintentionally or inadvertently.

OCR: "Office of Arts and Culture."

Opportunity Areas: (Taken from the Racial Equity Toolkit.) One of seven issue areas the City of Seattle is working on in partnership with the community to eliminate racial disparities and create racial equity. They include: Education, Health, Community Development, Criminal Justice, Jobs, Housing, and the Environment.

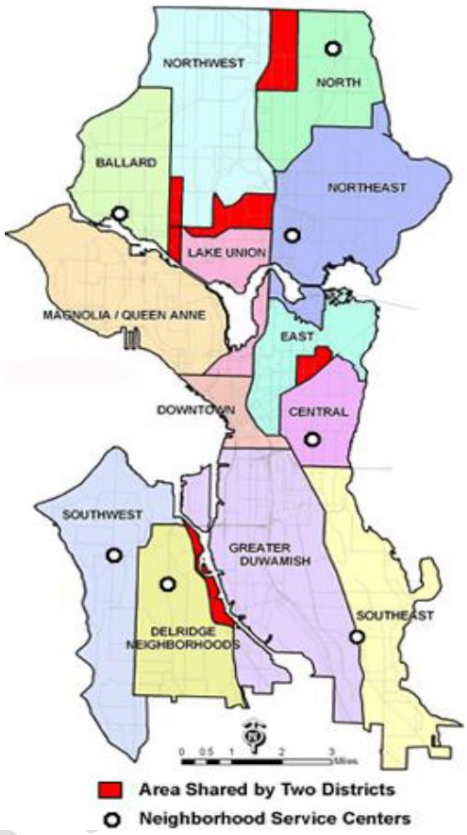
Racial Equity: (Taken from the Racial Equity Toolkit.) When social, economic and political opportunities are not predicted based upon a person's race.

DRAFT

Racial Inequity: (Taken from the Racial Equity Toolkit.) When a person's race can predict their social, economic, and political opportunities and outcomes.

RET: "Racial Equity Toolkit"

Seattle Neighborhoods: (Taken from the Racial Equity Toolkit Neighborhood.) Boundaries defined for the purpose of understanding geographic areas in Seattle.



Stakeholders: (Taken from the Racial Equity Toolkit.) Those impacted by proposed policy, program, or budget issue who have potential concerns or issue expertise. Examples might include: specific racial/ethnic groups, other institutions like Seattle Housing Authority, schools, community-based organizations, Change Teams, City employees, unions, etc.

Structural Racism: (Taken from the Racial Equity Toolkit.) The interplay of policies, practices and programs of multiple institutions which leads to adverse outcomes and conditions for communities of color compared to white communities that occurs within the context of racialized historical and cultural conditions.

Surveillance Ordinance: Seattle City Council passed Ordinance 125376, also referred to as the "Surveillance Ordinance."

SIR: "Surveillance Impact Report", a document which captures the fulfillment of the Council-defined Surveillance technology review process, as required by Ordinance 125376.

Workforce Equity: (Taken from the Racial Equity Toolkit.) Ensure the City's workforce diversity reflects the diversity of Seattle.

DRAFT

APPENDIX B: PUBLIC COMMENT DEMOGRAPHICS AND ANALYSIS

OVERVIEW OF PUBLIC COMMENT ANALYSIS

Analysis of public comments was completed using a combination of thematic analysis and qualitative coding. Comments were gathered from many sources, from public engagement meetings, an online survey form, letters, emails, and focus group discussions. All comments may be reviewed in the Surveillance Impact Report, Appendix E.

After assigning a theme and code for the content, City staff conducted an analysis using R. A high-level summary of the results of this analysis are shown below. A detailed description of the methodology is available in the Surveillance Impact Report, Appendix H.

Below is a summary of the responses by question, prepared by Privacy Office staff. This data includes comments from all submission methods (e.g. letter, email, public meeting, etc.). The total number of responses to this question is in the top right. The percentage of responses to that question, following the identified theme is shown in dark blue. The dark gray shows the percent of comments for this technology that did not answer that specific question. The light gray shows the percent of responses to that question that fall into other themes, (General, Data Management, Policy, Enforcement, and Oversight, etc.).

A word cloud of each qualitative sub-code identified appears at the bottom of each question to provide more context of the question response themes. If an appropriate quote could be identified to capture the overall tone of the majority of comments it was included.

DRAFT

COMMENTS SPECIFICALLY ADDRESSING CCTV TRAFFIC CAMERAS

Question 1

Do you have concerns about this specific technology or how it is used?

6

Reponses to this question

Concern | Did not respond to question | Other concern

General: Nondescript concern or a concern that is not applicable to the specific technology.

Unconcerned: Expressed a lack of concern around technology use or interest in expansion of use.

Policy, enforcement, and oversight: related to department and city policy, oversight, accountability, transparency, audit and policy enforcement.

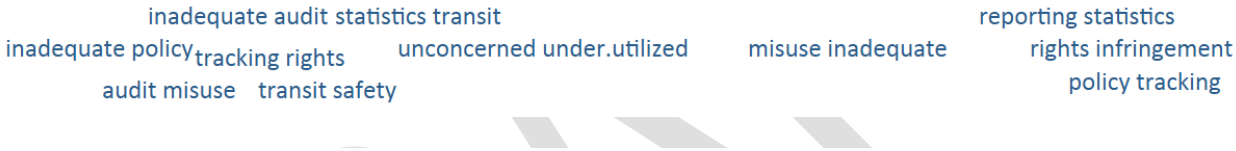
Government Overreach and Civil Liberties: Government unnecessarily or oversurveilling in a way that could impact individual rights and civil liberties.

Data management: Concerns expressed on any part of the data lifecycle, including third party use storage and retention.

Public safety: All applications of public safety from traffic and transit, to emergency response, and law enforcement

"Lack of a strong audit trail/inability to detect anomalous use/mis-use/abuse of the technology."

Common Themes



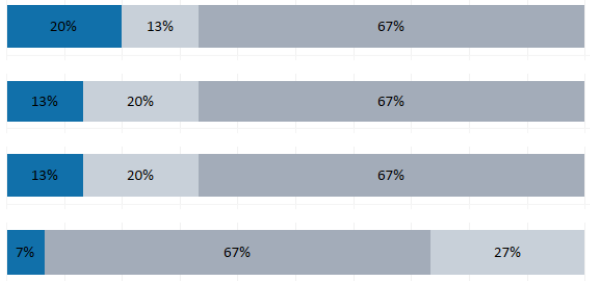
Question 2

What value do you think this technology brings to our city?

5

Reponses to this question

Yes | Null | No



Public safety: All applications of public safety from traffic and transit, to emergency response, and law enforcement.

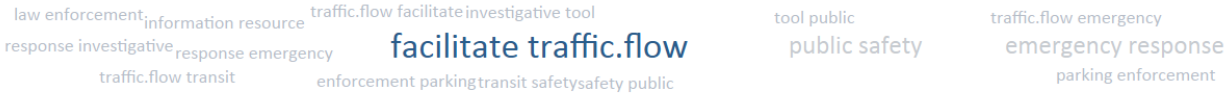
Efficiency and City finance: increase City capacity and results in cost savings, revenue generation, innovation, or better service.

Valuable: The public sees great value for City use of the technology, including to reduce bias through technological subjectivity.

None or not sure: Uncertain of the technology's value or does not believe any value comes from this technology's use.

"Traffic is a nightmare in/around Seattle. Traffic cameras help me make decisions regarding my commute or travel - as a commuter who takes the bus, traffic cameras and the SDOT Twitter feed allow me to change my bus riding times or bus route depending on traffic."

Common Themes



Question 3

What worries you about how this is used?

5

Reponses to this question

Worry | Other worry | Did not respond to question

	Worry	Other worry	Did not respond to question
Policy, enforcement, and oversight: related to department and city policy, oversight, accountability, transparency, audit and policy enforcement.	20%	13%	67%
Data management: Concerns expressed on any part of the data lifecycle, including third party use storage and retention.	7%	27%	67%

"Lack of an audit trail, risk for abuse, and silencing citizens"

Common Themes

data storage tax dollars management data audit lack unconcerned policy data management policy enforcement

Question 4

What recommendations would you give policy makers at the City about this technology?

5

Reponses

Policy recommendation | Other recomendation | Did not respond

	Policy recommendation	Other recomendation	Did not respond
Increase policy, enforcement, and oversight: recommendations related to department and city policy, oversight, accountability, transparency, audit and policy enforcement.	20.00%	13.33%	66.67%
Increase public safety resources: Invest in tools and resources for public safety, including additional officers or additional technology deployment.	13.33%	20.00%	66.67%
Weigh alternatives: Use a cost benefit analysis to determine if City budget should be used for these technologies, or for other priorities.	13.33%	20.00%	66.67%
Improve data management: Recommendation to improve approach to data lifecycle management, including third party use storage and retention.	6.67%	26.67%	66.67%
None: The respondent has no recommendations for policymakers.	6.67%	26.67%	66.67%

"Keep them. Expand them if necessary. Always be transparent about how the cameras are used. Never hide intentional or actual usage."

Common Themes

statistics cost.benefit policy development increase deployment reporting statistics transparency policy address concerns oversight add security address policy enforcement cost.benefit tradeoff public oversight concerns policy tradeoff public enforcement oversight data security development policy deployment transparency add cameras

Question 5

Can you imagine another way to solve the problem this technology solves?

4

Reponses to this question

Yes | No | Null

	Yes	No	Null
None: The respondent has no alternative soluitons to recommend.	13.33%	13.33%	73.33%
Public safety: All applications of public safety from traffic and transit, to emergency response, and law enforcement	6.67%	20.00%	73.33%

"Design our roads to discourage speeding, which would reduce crashes, which would reduce backups, which is proven to work, and would make conditions more welcoming for walking biking and transit."

Common Themes

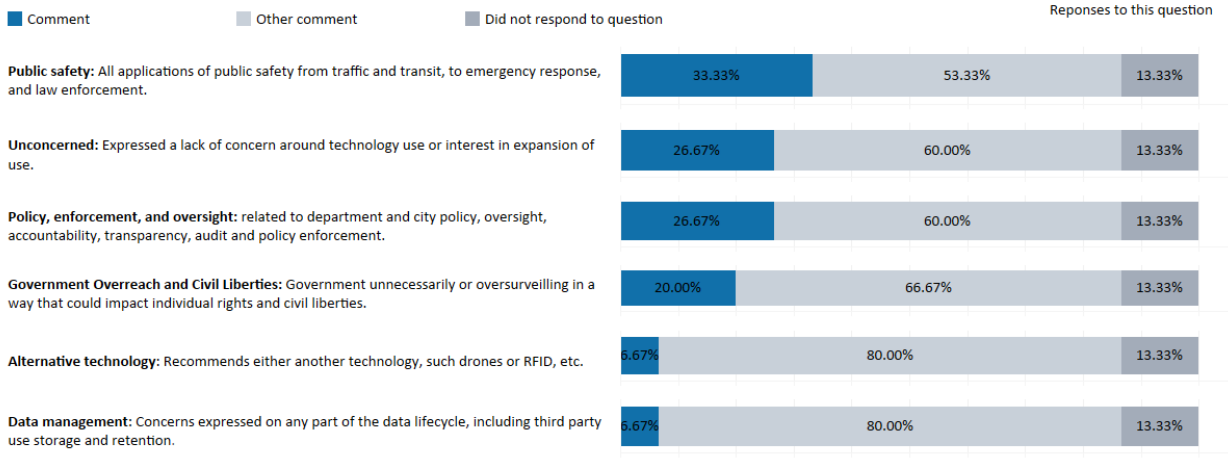
response investigative investigative tool city planning emergency response

Question 6

Do you have any other comments?

13

Reponses to this question



"I appreciate the honesty and openness SDOT gave regarding this technology at one of the community engagement meetings."

Common Themes

transparency accountability emergency response education community

DRAFT

General Surveillance Comment Themes

Many comments were submitted as part of the public comment period that were not specific to a technology, but to either the concept of surveillance in general, or to technologies which are not on the Master List.

Themes

Color legend

3 16

Top themes

public safety	Safety of the public, including first response, and in some cases traffic safety.
crime prevention	Tool or process to aid in the prevention of crime by police.
transit safety	Safety on or around public transit, roadways, or relating to traffic overall, including bicycle and pedestrian.
law enforcement	Enforce the laws, whether related to City policy, traffic law, or public safety law enforcement.
increase police	Policy recommendation or alternative solution that requires more police officers.
parking enforcement	Enforcement of laws specifically related to parking infractions.
facilitate traffic.flow	Improve the ability for cars, buses and bicycle to navigate through the City.
redlight cameras	Subject of comment was a camera technology exempt from SIR process by Ordinance and not under review.
add cameras	Desire for additional cameras, to include police, traffic, red-light or other.
investigative tool	Value or other comment of police to use technology as a tool for solving open or active crimes.
public oversight	Desire for public oversight of technology, may include voting, audits, or other transparency methods.
increase deployment	Increase the use and deployment of surveillance technology.

DEMOGRAPHICS FOR GROUP ONE COMMENTS

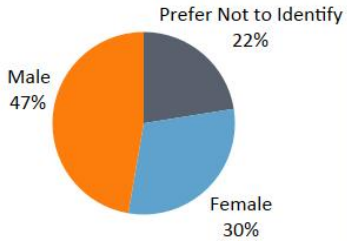
The number of reported demographics does not correspond to the number of comments received for the following reasons.

1. The demographic information includes all responses, regardless of which technology was commented on to protect the privacy of those who provided a response.
2. Some individuals offered more than one comment.
3. Some individuals did not provide any demographic information.

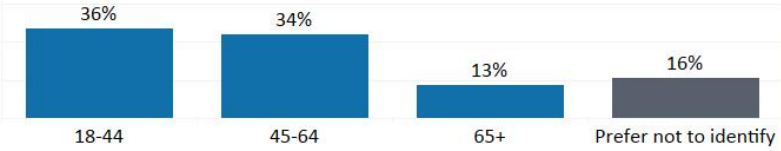
Method Submitted By

Focus Group 1	9
Focus Group 2	5
Meeting 1	15
Meeting 2	7
Meeting 3	10
Meeting 4	14
Meeting 5	5
Survey Monkey	64
Grand Total	129

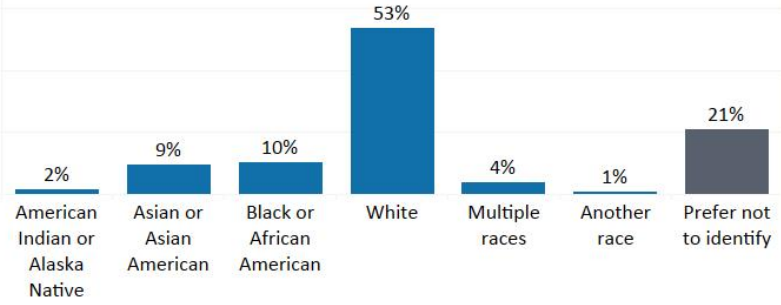
Gender



Age



Enthnicity



Neighborhoods

King County (outside Seattle)	8
Outside of King County	1
Prefer not to identify	10

APPENDIX C: PUBLIC MEETING NOTICE(S)

Notice of Public Meetings
Surveillance Technology Public Comment

This is the first round of public comment on previously acquired surveillance technologies. For more information on these technologies or Surveillance Ordinance visit **seattle.gov/privacy**.

	Meeting 1	Meeting 2	Meeting 3	Meeting 4	Meeting 5
Depts. Presenting	Police Dept.	Transportation, Fire Dept.	Police Dept.	Police Dept.	Transportation, Fire Dept.
Date & Time	October 22, 2018 5-6:30 p.m.	October 25, 2018 5-6:30 p.m.	October 29, 2018 5-6:30 p.m.	October 30, 2018 5-6:30 p.m.	November 5, 2018 4:30-5:30 p.m.
Location	**Columbia City Branch Library** 4721 Rainier Ave S, Seattle, WA 98118	**American Legion Hall: West Seattle** 3618 SW Alaska St. Seattle, WA 98126	**Bertha Knight Landes Room** 1st Floor City Hall - 600 4th Ave, Seattle, WA 98104 (5th Ave door)	**Green Lake Branch Library** 7364 East Green Lake Dr. N, Seattle, WA 98115	**Green Lake Branch Library** 7364 East Green Lake Dr. N, Seattle, WA 98115

Technologies discussed at the meetings include:

Transportation (Meetings 2 & 5)	**Fire Dept.** (Meetings 2 & 5)	**Police Dept.** (Meetings 1, 3, & 4)
Traffic Cameras & License Plate Readers	Emergency Scene Cameras & Hazmat Cameras	Parking Enforcement Systems & Automated License Plate Readers

Here's how you can provide comments:

The open comment period for these technologies is **October 8 - November 5, 2018.** There are three ways to comment:

1. Attend the meeting. See the table above for locations and times.

2. Submit comment online at **seattle.gov/privacy**.

3. Send mail to Attn: Surveillance & Privacy Program, Seattle IT, PO Box 94709, Seattle, WA 98124.

Comments submitted will be included in the final Surveillance Impact Report submitted to City Council and available to the public. To comment after this period has closed, contact City Council staff at **seattle.gov/Council**.

Please note, this meeting will:

Be video recorded. **Ask for a sign-in record of attendees.** **Collect public comments.**

For meeting accommodations: Please let us know **two weeks in advance of the meeting date** if language translation, or other services are needed by emailing **Surveillance@seattle.gov**.

City of Seattle

Aviso de audiencias públicas

Comentarios del público sobre tecnologías de vigilancia

Esta es la primera ronda de audiencias públicas sobre tecnologías de vigilancia adquiridas previamente. Para obtener más información sobre estas tecnologías o sobre la Surveillance Ordinance (Ordenanza sobre Vigilancia), visite **seattle.gov/privacy**.

	Audiencia 1	Audiencia 2	Audiencia 3	Audiencia 4	Audiencia 5
Departamentos a cargo	Depto. de Policía	Depto. de Transporte y de Bomberos	Depto. de Policía	Depto. de Policía	Depto. de Transporte y de Bomberos
Fecha y hora	22 de octubre de 2018 5:00 a 6:30 p. m.	25 de octubre de 2018 5:00 a 6:30 p. m.	29 de octubre de 2018 5:00 a 6:30 p. m.	30 de octubre de 2018 5:00 a 6:30 p. m.	5 de noviembre de 2018 4:30 a 5:30 p. m.
Lugar	**Columbia City Branch Library** 4721 Rainier Ave S, Seattle, WA 98118	**American Legion Hall: West Seattle** 3618 SW Alaska St. Seattle, WA 98126	**Bertha Knight Landes Room** 1st Floor City Hall - 600 4th Ave, Seattle, WA 98104 (5th Ave door)	**Green Lake Branch Library** 7364 East Green Lake Dr. N, Seattle, WA 98115	**Green Lake Branch Library** 7364 East Green Lake Dr. N, Seattle, WA 98115

En las audiencias se hablará de las siguientes tecnologías:

Transporte (audiencias 2 y 5)	**Depto. de Bomberos** (audiencias 2 y 5)	**Depto. de Policía** (audiencias 1, 3 y 4)
Cámaras de tránsito y lectores de placas de automóviles	Cámaras para escenas de emergencia y cámaras para Hazmat (hazardous materials, materiales peligrosos)	Sistemas de control de áreas de estacionamiento y lectores automáticos de placas de automóviles

Cómo puede enviar sus comentarios:

El período abierto para recibir comentarios sobre estas tecnologías es desde el **8 de octubre hasta el 5 de noviembre de 2018.** Existen tres formas de aportar comentarios:

1. Asista a la audiencia. Consulte la tabla anterior para conocer los horarios y los lugares.

2. Deje sus comentarios en línea en **seattle.gov/privacy**.

3. Envíe comentarios por correo postal a la siguiente dirección: Surveillance & Privacy Program, Seattle IT, PO Box 94709, Seattle, WA 98124.

Los comentarios enviados se incluirán en la versión final del Surveillance Impact Report (Informe del efecto de la vigilancia) que se presentará ante el Consejo de la Ciudad y estará disponible al público en general. Para aportar comentarios luego de este período, comuníquese con el personal del Consejo de la Ciudad desde la página web **seattle.gov/Council**.

Tenga en cuenta que esta audiencia tendrá las siguientes características:

Se grabará en video. **Se llevará un registro de asistencia.** **Se recolectarán comentarios del público.**

Adaptaciones para las audiencias: Si necesita servicios de traducción u otros servicios, envíenos un correo electrónico a **Surveillance@seattle.gov dos semanas antes de la audiencia.**

City of Seattle

Ogaysiiska Kulanada Dadwaynaha

Fikradaha Dadwayanaha ee ku aadan Qalabka Muraaqabaynta Casriga ah

Kani waa wareegi koowaad ee lagu aruurinaayo fikradaha dadwaynuhu kaqabaan qalabka muraaqabaynta casriga ah noociisii hore. Wixii macluumaad dheeraad ah oo kusaabsan qalabkaan ama Surveillance Ordinance (Qaabka Muraaqabaynta) booqo **seattle.gov/privacy**.

	Kulanka 1	Kulanka 2	Kulanka 3	Kulanka 4	Kulanka 5
Waaxaha. Soojeedinta	Waaxda Booliiska.	Gaadiidka, Waaxda Dab Damiska.	Waaxda Booliiska.	Waaxda Booliiska.	Gaadiidka, Waaxda Dab Damiska.
Tariikhda iyo waqtiga	Oktoobar 22, 2018 5-6:30 p.m.	Oktoobar 25, 2018 5-6:30 p.m.	Oktoobar 29, 2018 5-6:30 p.m.	Oktoobar 30, 2018 5-6:30 p.m.	Nofeembar 5, 2018 4:30-5:30 p.m.
Goobta	**Laanta Maktabada ee Magaalada Columbia** 4721 Rainier Ave S, Seattle, WA 98118	**American Legion Hall: West Seattle** 3618 SW Alaska St. Seattle, WA 98126	**Bertha Knight Landes Room** 1st Floor City Hall - 600 4th Ave, Seattle, WA 98104 (5th Ave door)	**Laanta Maktabada Green Lake** 7364 East Green Lake Dr. N, Seattle, WA 98115	**Laanta Maktabada Green Lake** 7364 East Green Lake Dr. N, Seattle, WA 98115

Tignoolojiyadaha looga dooday kulanada waxaa kamid ah:

Gaadiidka (kulanada 2 iyo 5)	**Waaxda Dab damiska.** (Kulanada 2 iyo 5)	**Waaxda Booliiska.** (Kulanada 1, 3, iyo 4)
Kaamirooyinka taraafikada iyo Qalabka Akhriya Aqoonsiga Shatiyada	Kaamirooyinka Dhacdooyinka Degdega ah iyo kaamiroyinka Hamzat	Nidaamyada Xakamaynta Baakinka iyo Qalabka Akhriya Aqoonsiga Shatiyada

Halkaan kabaro sida aad fikrado kudhiiban karto:

Mudada ay furantahay fikrad kadhiibashada qalabkaan casriga ah waa Oktoobar 8 - Nofeembar 5, 2018. Waxaa jira saddex qaab oo fikir lagu dhiiban karo:

1. Inaad kulanka kaqaybgasho. Fiiri shaxda kore oo ay kuqoran yihiin goobaha iyo xiliyada laqabanaayo kulanada.
2. Fikirkaaga kudir si oonleen ah **seattle.gov/privacy**.
3. Boosto udir: Surveillance & Privacy Program, Seattle IT, PO Box 94709, Seattle, WA 98124.

Fikrado kasta oo lasoo gudbiyo waxaa lagu darayaa War bixinta ugu danbaysa Surveillance Impact Report (Saamaraynta Qalabka Muraaqabada) ee loogudbiyo Dawlada hoose dadwaynuhuna ay akhri sankaraan. Si aad fikirkaaga udhiibato kadib marka mudadaan dhammaato, laxiriir Shaqaalaha Dawlada Hoose oo ciwaankoodu yahay **seattle.gov/Council**.

Fadlan ogsoonow, kulankaan waa:

Laduubayaa si muqaal ahaan ah. **Dalbo Diiwanka Galitaanka dadka Kaqaybgalaaya ay saxiixayaan.** **Aruuri Fikradaha Dadwaynaha.**

Wixi laxiriira adeegyada kulanada intay socdaan labixinaayo: Fadlan noosoosheeg **labo asbuuc kahor taariikhda kulanku dhacayo** haddii adeegyada turjumida luuqada, ama adeegyo kale loobaahdo adoo email noogusoo diraaya **Surveillance@seattle.gov**.

City of Seattle

公開會議通知
監視技術公開意見徵集會

這是第一輪會議，徵集公眾對之前取得的監控技術的建議。要獲取有關這些技術或 Surveillance Ordinance（監控條例）的更多資訊，請瀏覽 seattle.gov/privacy。

	會議 1	會議 2	會議 3	會議 4	會議 5
出席部門	警察署	交通、消防署	警察署	警察署	交通、消防署
日期及時間	2018 年 10 月 22 日 下午 5-6:30	2018 年 10 月 25 日 下午 5-6:30	2018 年 10 月 29 日 下午 5-6:30	2018 年 10 月 30 日 下午 5-6:30	2018 年 11 月 5 日 下午 4:30-5:30
地點	**Columbia City Branch Library** 4721 Rainier Ave S, Seattle, WA 98118	**American Legion Hall: West Seattle** 3618 SW Alaska St. Seattle, WA 98126	**Bertha Knight Landes Room** 1st Floor City Hall - 600 4th Ave, Seattle, WA 98104 (5th Ave door)	**Green Lake Branch Library** 7364 East Green Lake Dr. N, Seattle, WA 98115	**Green Lake Branch Library** 7364 East Green Lake Dr. N, Seattle, WA 98115

會上討論的技術包括：

交通署（會議 2 和會議 5）	**消防署**（會議 2 和會議 5）	**警察署**（會議 1、3 和 4）
交通攝像頭和 車輛牌照識別器	緊急現場攝像頭與危險品攝像頭	停車執行系統與車輛牌照自動識別器

您提交意見的方式：

針對這些技術的公眾意見徵集時間是 **2018 年 10 月 8 日至 11 月 5 日**。有三種方式可提交意見：

出席會議。
和時間見上表。

2. 透過 seattle.gov/privacy 網上提交意見。

3. 寄郵件至：Surveillance & Privacy Program, Seattle IT, PO Box 94709, Seattle, WA 98124。

提交的所有意見都將收錄於最終的 Surveillance Impact Report（監控影響報告），遞交至市議會並向大眾開放。如果要在此期間結束後提交意見，請瀏覽 seattle.gov/Council，聯繫市議會的工作人員。

請注意，此會議將：

進行錄影。 **要求參會者簽到。** **收集公眾意見。**

會議輔助服務：如果需要語言翻譯或其他服務，請**參照會議日期提前兩週**發送電子郵件至 Surveillance@seattle.gov 告知我們。

City of Seattle

公开会议通知

监控技术公众意见征集会

这是第一轮会议，征集公众对之前取得的监控技术的意见。要获得有关这些技术或 Surveillance Ordinance（监控条例）的更多信息，请访问 **seattle.gov/privacy**。

	第 1 次会议	**第 2 次会议**	**第 3 次会议**	**第 4 次会议**	**第 5 次会议**
出席部门	警察局	交通、消防局	警察局	警察局	交通、消防局
日期与时间	2018 年 10 月 22 日 下午 5-6:30	2018 年 10 月 25 日 下午 5-6:30	2018 年 10 月 29 日 下午 5-6:30	2018 年 10 月 30 日 下午 5-6:30	2018 年 11 月 5 日 下午 4:30-5:30
地点	**Columbia City Branch Library** 4721 Rainier Ave S, Seattle, WA 98118	**American Legion Hall: West Seattle** 3618 SW Alaska St. Seattle, WA 98126	**Bertha Knight Landes Room** 1st Floor City Hall - 600 4th Ave, Seattle, WA 98104 (5th Ave door)	**Green Lake Branch Library** 7364 East Green Lake Dr. N, Seattle, WA 98115	**Green Lake Branch Library** 7364 East Green Lake Dr. N, Seattle, WA 98115

会上讨论的技术包括：

交通局（第 2 和第 5 次会议）	**消防局**（第 2 和第 5 次会议）	**警察局**（第 1、3、4 次会议）
交通摄像头和 车辆牌照识别器	紧急现场摄像头与危险品摄像头	停车执行系统与车辆牌照自动识别器

您提交意见的方式：

针对这些技术的公众意见征集时间是 **2018 年 10 月 8 日至 11 月 5 日**。提交意见的三种途径：

1. 出席会议。
地点和时间见上表。

2. 通过网站 **seattle.gov/privacy** 在线提交意见。

3. 寄送邮件至：Surveillance & Privacy Program, Seattle IT, PO Box 94709, Seattle, WA 98124。

提交的所有意见都将收录于最终的 Surveillance Impact Report（监控影响报告），递交至市议会并向大众开放。如果要在此期间结束后提交意见，请浏览 **seattle.gov/Council**，联系市议会的工作人员。

请注意，此会议将：

进行录像。 **要求参会者签到。** **收集公众意见。**

会议辅助服务：如果需要语言翻译或其他服务，请参照会议**日期提前两周**发送电子邮件至 **Surveillance@seattle.gov**

City of Seattle

Thông Báo Về Các Cuộc Họp Công Chúng

Ý Kiến Của Công Chúng Về Công Nghệ Giám Sát

Đây là vòng thu thập ý kiến của công chúng đầu tiên về các công nghệ giám sát đã được ứng dụng trước đây. Để có thêm thông tin về các công nghệ này hoặc Surveillance Ordinance (Sắc Lệnh Giám Sát), hãy truy cập **seattle.gov/privacy**.

	Cuộc họp 1	Cuộc họp 2	Cuộc họp 3	Cuộc họp 4	Cuộc họp 5
Các Sở Tổ Chức Cuộc Họp	Sở Cảnh Sát	Sở Giao Thông Vận Tải, Sở Cứu Hỏa	Sở Cảnh Sát	Sở Cảnh Sát	Sở Giao Thông Vận Tải, Sở Cứu Hỏa
Ngày & Giờ	Ngày 22 tháng 10 năm 2018 5 giờ - 6 giờ 30 phút chiều	Ngày 25 tháng 10 năm 2018 5 giờ - 6 giờ 30 phút chiều	Ngày 29 tháng 10 năm 2018 5 giờ - 6 giờ 30 phút chiều	Ngày 30 tháng 10 năm 2018 5 giờ - 6 giờ 30 phút chiều	Ngày 5 tháng 11 năm 2018 4 giờ 30 - 5 giờ 30 phút chiều
Địa điểm	**Columbia City Branch Library** 4721 Rainier Ave S, Seattle, WA 98118	**American Legion Hall: West Seattle** 3618 SW Alaska St. Seattle, WA 98126	**Bertha Knight Landes Room** 1st Floor City Hall - 600 4th Ave, Seattle, WA 98104 (5th Ave door)	**Green Lake Branch Library** 7364 East Green Lake Dr. N, Seattle, WA 98115	**Green Lake Branch Library** 7364 East Green Lake Dr. N, Seattle, WA 98115

Các công nghệ được thảo luận tại các cuộc họp bao gồm:

Giao thông vận tải (Cuộc họp 2 & 5)	**Sở Cứu Hỏa** (Cuộc họp 2 & 5)	**Sở Cảnh Sát** (Cuộc họp 1, 3 & 4)
Các Máy Quay Giao Thông & Các Thiết Bị Đọc Biển Số Xe	Máy Quay Trường Hợp Khẩn Cấp & Máy Quay Hazmat	Hệ Thống Thực Thi Việc Đậu Xe & Các Thiết Bị Đọc Biển Số Xe Tự Động

Đây là cách quý vị có thể đưa ra ý kiến của mình:

Thời gian lấy ý kiến cho các công nghệ trên là **Ngày 8 tháng 10 – Ngày 5 tháng 11 năm 2018.** Có ba cách đưa ra ý kiến:

1. Tham dự cuộc họp. Xem bảng bên trên để biết thời gian và địa điểm.

2. Nộp ý kiến trực tuyến tại **seattle.gov/privacy**.

3. Gửi thư đến Attn: Surveillance & Privacy Program, Seattle IT, PO Box 94709, Seattle, WA 98124.

Các ý kiến được nộp sẽ được đưa vào bản Surveillance Impact Report (Báo Cáo Tác Động Giám Sát) cuối cùng nộp cho Hội Đồng Thành Phố và có sẵn dành cho công chúng. Để đưa ra ý kiến sau khi giai đoạn thu thập ý kiến đã kết thúc, hãy liên hệ với nhân viên của Hội Đồng Thành Phố tại **seattle.gov/Council**.

Vui lòng lưu ý, cuộc họp này sẽ:

Được ghi hình.

Yêu cầu lưu tên trong danh sách đăng ký tham dự.

Thu thập các ý kiến của công chúng.

Để đáp ứng các yêu cầu điều chỉnh: Vui lòng thông báo cho chúng tôi biết **hai tuần trước ngày diễn ra cuộc họp** nếu quý vị cần dịch vụ thông dịch ngôn ngữ hoặc các dịch vụ khác, bằng cách gửi email đến **Surveillance@seattle.gov**.

City of Seattle

Paunawa sa Mga Pampublikong Pagpupulong

Komento ng Publiko sa Teknolohiya sa Pagmamanman

Ito ang unang round para sa pagkomento ng publiko tungkol sa mga dating nakuhang teknolohiya sa pagmamanman. Para sa higit pang impormasyon tungkol sa mga teknolohiyang ito o sa Surveillance Ordinance (Ordinansa sa Pagmamanman), bumisita sa **seattle.gov/privacy**.

	Pagpupulong 1	Pagpupulong 2	Pagpupulong 3	Pagpupulong 4	Pagpupulong 5
Mga departamento na Naglalahad	Departamento ng Pulisya	Departamento ng Transportasyon, Bumbero	Departamento ng Pulisya	Departamento ng Pulisya	Departamento ng Transportasyon, Bumbero
Petsa at Oras	Oktubre 22, 2018 5-6:30 p.m.	Oktubre 25, 2018 5-6:30 p.m.	Oktubre 29, 2018 5-6:30 p.m.	Oktubre 30, 2018 5-6:30 p.m.	Nobyembre 5, 2018 4:30-5:30 p.m.
Lokasyon	**Columbia City Branch Library** 4721 Rainier Ave S, Seattle, WA 98118	**American Legion Hall: West Seattle** 3618 SW Alaska St. Seattle, WA 98126	**Bertha Knight Landes Room** 1st Floor City Hall - 600 4th Ave, Seattle, WA 98104 (5th Ave door)	**Green Lake Branch Library** 7364 East Green Lake Dr. N, Seattle, WA 98115	**Green Lake Branch Library** 7364 East Green Lake Dr. N, Seattle, WA 98115

Kabilang sa mga teknolohiyang tatalakayin sa mga pagpupulong ang:

Transportasyon (Pagpupulong 2 at 5)	**Departamento ng Bumbero** (Pagpupulong 2 at 5)	**Departamento ng Pulisya** (Pagpupulong 1, 3, at 4)
Mga Camera sa Trapiko at License Plate Readers (Mga Tagabasa ng Lisensyadong Plaka)	Mga Camera sa Pinangyarihan ng Emergency at Mga Camera ng Hazmat	Mga Sistema sa Pagpapatupad ng Tamang Pagpaparada at Mga Automated License Plate Reader (Mga Awtomatikong Tagabasa ng Lisensyadong Plaka)

Narito ang mga paraan kung paano ka makapagbibigay ng mga komento:

Ang panahon ng bukas na pagkokomento para sa mga teknolohiyang ito ay mula **Oktubre 8 - Nobyembre 5, 2018.** May tatlong paraan upang makapagkomento:

1. Dumalo sa pulong. Tingnan ang talahanayan sa itaas para sa mga lokasyon at oras.
2. Magsumite ng komento online sa **seattle.gov/privacy**.
3. Magpadala ng liham sa Attn: Surveillance & Privacy Program, Seattle IT, PO Box 94709, Seattle, WA 98124.

Isasama ang anumang isinumiteng komento sa huling Surveillance Impact Report (Ulat sa Epekto ng Pagmamanman) na isusumite sa Konseho ng Lungsod at isasapubliko. Upang makapagbigay ng komento pagkalipas ng panahong ito, makipag-ugnayan sa mga kawani ng Konseho ng Lungsod sa **seattle.gov/Council**.

Mangyaring tandaan, ang pulong na ito ay:

Ire-record sa video.

Hihingi ng tala ng pag-sign in ng mga dadalo.

Mangongolekta ng mga komento ng publiko:

Para sa mga pangangailangan sa pagpupulong: Mangyaring ipaalam sa amin kung kailangan mo ng mga serbisyo sa pagsasalin ng wika o iba pang serbisyo **dalawang linggo bago ang petsa ng pagpupulong** sa pamamagitan ng pagpapadala ng email sa **Surveillance@seattle.gov**.

City of Seattle

공개 회의 통지
감시 기술 여론 수렴

본 회의는 과거 획득된 감시 기술에 대한 제1차 여론 수렴 회의입니다. 본 기술 또는 Surveillance Ordinance(감시 조례 관련) 자세한 정보는 **seattle.gov/privacy**를 참조해 주시기 바랍니다.

	회의1	**회의2**	**회의3**	**회의4**	**회의5**
발표 부처	경찰국	교통국, 소방국	경찰국	경찰국	교통국, 소방국
날짜 및 시간	2018년 10월 22일 5-6:30 p.m.	2018년 10월 25일 5-6:30 p.m.	2018년 10월 29일 5-6:30 p.m.	2018년 10월 30일 5-6:30 p.m.	2018년 11월 5일 4:30-5:30 p.m.
장소	**Columbia City Branch Library** 4721 Rainier Ave S, Seattle, WA 98118	**American Legion Hall: West Seattle** 3618 SW Alaska St. Seattle, WA 98126	**Bertha Knight Landes Room** 1st Floor City Hall - 600 4th Ave, Seattle, WA 98104 (5th Ave door)	**Green Lake Branch Library** 7364 East Green Lake Dr. N, Seattle, WA 98115	**Green Lake Branch Library** 7364 East Green Lake Dr. N, Seattle, WA 98115

회의에서 논의되는 기술 항목:

교통국(회의 2 & 5)	**소방국** (회의 2 & 5)	**경찰국** (회의 1, 3, & 4)
교통 카메라 및 번호판 판독기	응급 현장 카메라 및 Hazmat 카메라	주차 단속 시스템 및 자동 번호판 판독기

의견 전달 방법:

상기 기술에 대한 공개 의견 기간은 **2018년 10월 8일~11월 5일**입니다. 의견 전달 방법은 다음 세 가지입니다.

1. 회의에 참석합니다. 장소 및 시간은 상기 표를 참조해 주십시오.

2. 의견은 온라인 **seattle.gov/privacy**로 제출해 주십시오.

3. 우편 발송지: Surveillance & Privacy Program, Seattle IT, PO Box 94709, Seattle, WA 98124.

제출된 의견은 시의회에 전달되는 최종Surveillance Impact Report(감시 영향 보고서)에 수록되며 일반에게도 공개됩니다. 본 의견 수렴 기간 종료 후 의견을 제출하시려면, 시의회 담당 직원에게 **seattle.gov/Council**로 문의해 주시기 바랍니다.

회의 시 참고 사항은 다음과 같습니다.

비디오가 녹화됩니다. **참가 기록을 요청합니다.** **대중 의견을 수집합니다.**

회의 편의 제공: 언어 번역 또는 기타 서비스가 필요한 경우 **회의 개최일 2주 전**에 **Surveillance@seattle.gov**로 이메일을 보내 당국에 알려 주시기 바랍니다.

City of Seattle

APPENDIX D: MEETING SIGN-IN SHEET(S)

Neighborhood		Race/Ethnicity	Age	Gender
☐ Ballard	☐ Lake Union	☒ White	☐ Under 18	☒ Female
☐ Central	☐ North	☐ Black or African American	☐ 18-44	☐ Male
☐ Delridge	☐ Northeast	☐ American Indian or Alaska Native	☐ 45-64	☐ Transgender
☐ East District	☐ Southeast	☐ Asian	☒ 65 +	☐ Prefer not to identify
☐ Greater Duwamish	☐ Southwest	☐ Native Hawaiian or other Pacific Islander	☐ Prefer not to identify	
☐ King County (outside Seattle)		☐ Hispanic or Latino		
☒ Prefer not to identify		☐ Prefer not to identify		

Neighborhood		Race/Ethnicity	Age	Gender
☐ Ballard	☐ Lake Union	☐ White	☐ Under 18	☐ Female
☐ Central	☐ North	☐ Black or African American	☐ 18-44	☒ Male
☐ Delridge	☐ Northeast	☐ American Indian or Alaska Native	☒ 45-64	☐ Transgender
☐ East District	☐ Southeast	☒ Asian	☐ 65 +	☐ Prefer not to identify
☐ Greater Duwamish	☐ Southwest	☐ Native Hawaiian or other Pacific Islander	☐ Prefer not to identify	
☒ King County (outside Seattle)		☐ Hispanic or Latino		
☐ Prefer not to identify		☐ Prefer not to identify		

Neighborhood		Race/Ethnicity	Age	Gender
☐ Ballard	☐ Lake Union	☑ White	☐ Under 18	☐ Female
☐ Central	☐ North	☐ Black or African American	☐ 18-44	☑ Male
☐ Delridge	☐ Northeast	☐ American Indian or Alaska Native	☑ 45-64	☐ Transgender
☐ East District	☐ Southeast	☐ Asian	☐ 65 +	☐ Prefer not to identify
☐ Greater Duwamish	☑ Southwest	☐ Native Hawaiian or other Pacific Islander	☐ Prefer not to identify	
☐ King County (outside Seattle)		☐ Hispanic or Latino		
☐ Prefer not to identify		☐ Prefer not to identify		

Neighborhood		Race/Ethnicity	Age	Gender
☐ Ballard	☐ Lake Union	☐ White	☐ Under 18	☐ Female
☐ Central	☐ North	☐ Black or African American	☐ 18-44	☐ Male
☐ Delridge	☐ Northeast	☐ American Indian or Alaska Native	☒ 45-64	☐ Transgender
☐ East District	☐ Southeast	☐ Asian	☐ 65 +	☐ Prefer not to identify
☐ Greater Duwamish	☒ Southwest	☐ Native Hawaiian or other Pacific Islander	☐ Prefer not to identify	
☐ King County (outside Seattle)		☐ Hispanic or Latino		
☐ Prefer not to identify		☐ Prefer not to identify		

Neighborhood		Race/Ethnicity	Age	Gender
☐ Ballard	☐ Lake Union	☒ White	☐ Under 18	☒ Female
☐ Central	☐ North	☐ Black or African American	☐ 18-44	☐ Male
☐ Delridge	☐ Northeast	☐ American Indian or Alaska Native	☒ 45-64	☐ Transgender
☐ East District	☐ Southeast	☐ Asian	☐ 65 +	☐ Prefer not to identify
☐ Greater Duwamish	☒ Southwest	☐ Native Hawaiian or other Pacific Islander	☐ Prefer not to identify	
☐ King County (outside Seattle)		☐ Hispanic or Latino		
☐ Prefer not to identify		☐ Prefer not to identify		

Neighborhood		Race/Ethnicity	Age	Gender
☐ Ballard	☐ Lake Union	☒ White	☐ Under 18	☐ Female
☐ Central	☐ North	☐ Black or African American	☐ 18-44	☒ Male
☐ Delridge	☒ Northeast	☐ American Indian or Alaska Native	☒ 45-64	☐ Transgender
☐ East District	☐ Southeast	☐ Asian	☐ 65 +	☐ Prefer not to identify
☐ Greater Duwamish	☐ Southwest	☐ Native Hawaiian or other Pacific Islander	☐ Prefer not to identify	
☐ King County (outside Seattle)		☐ Hispanic or Latino		
☐ Prefer not to identify		☐ Prefer not to identify		

Neighborhood		Race/Ethnicity	Age	Gender
☐ Ballard	☐ Lake Union	☑ White	☐ Under 18	☐ Female
☑ Central	☐ North	☐ Black or African American	☑ 18-44	☑ Male
☐ Delridge	☐ Northeast	☐ American Indian or Alaska Native	☐ 45-64	☐ Transgender
☐ East District	☐ Southeast	☐ Asian	☐ 65 +	☐ Prefer not to identify
☐ Greater Duwamish	☐ Southwest	☐ Native Hawaiian or other Pacific Islander	☐ Prefer not to identify	
☐ King County (outside Seattle)		☐ Hispanic or Latino		
☐ Prefer not to identify		☐ Prefer not to identify		

Neighborhood		Race/Ethnicity	Age	Gender
☒ Ballard	☐ Lake Union	☒ White	☐ Under 18	☐ Female
☐ Central	☐ North	☐ Black or African American	☐ 18-44	☒ Male
☐ Delridge	☐ Northeast	☐ American Indian or Alaska Native	☒ 45-64	☐ Transgender
☐ East District	☐ Southeast	☒ Asian	☐ 65 +	☐ Prefer not to identify
☐ Greater Duwamish	☐ Southwest	☐ Native Hawaiian or other Pacific Islander	☐ Prefer not to identify	
☐ King County (outside Seattle)		☐ Hispanic or Latino		
☐ Prefer not to identify		☐ Prefer not to identify		

Neighborhood		Race/Ethnicity	Age	Gender
☐ Ballard	☐ Lake Union	☒ White	☐ Under 18	☐ Female
☒ Central	☐ North	☐ Black or African American	☐ 18-44	☒ Male
☐ Delridge	☐ Northeast	☐ American Indian or Alaska Native	☐ 45-64	☐ Transgender
☐ East District	☐ Southeast	☐ Asian	☒ 65 +	☐ Prefer not to identify
☐ Greater Duwamish	☐ Southwest	☐ Native Hawaiian or other Pacific Islander	☐ Prefer not to identify	
☐ King County (outside Seattle)		☐ Hispanic or Latino		
☐ Prefer not to identify		☐ Prefer not to identify		

Neighborhood		Race/Ethnicity	Age	Gender
☐ Ballard	☐ Lake Union	☑ White	☐ Under 18	☑ Female
☑ Central	☐ North	☐ Black or African American	☐ 18-44	☐ Male
☐ Delridge	☐ Northeast	☐ American Indian or Alaska Native	☐ 45-64	☐ Transgender
☐ East District	☐ Southeast	☐ Asian	☑ 65 +	☐ Prefer not to identify
☐ Greater Duwamish	☐ Southwest	☐ Native Hawaiian or other Pacific Islander	☐ Prefer not to identify	
☐ King County (outside Seattle)		☐ Hispanic or Latino		
☐ Prefer not to identify		☐ Prefer not to identify		

Neighborhood		Race/Ethnicity	Age	Gender
☐ Ballard	☐ Lake Union	☑ White	☐ Under 18	☐ Female
☑ Central	☐ North	☐ Black or African American	☑ 18-44	☑ Male
☐ Delridge	☐ Northeast	☐ American Indian or Alaska Native	☐ 45-64	☐ Transgender
☐ East District	☐ Southeast	☐ Asian	☐ 65 +	☐ Prefer not to identify
☐ Greater Duwamish	☐ Southwest	☑ Native Hawaiian or other Pacific Islander	☐ Prefer not to identify	
☐ King County (outside Seattle)		☐ Hispanic or Latino		
☐ Prefer not to identify		☐ Prefer not to identify		

Neighborhood		Race/Ethnicity	Age	Gender
☒ Ballard	☐ Lake Union	☒ White	☐ Under 18	☒ Female
☐ Central	☐ North	☐ Black or African American	☒ 18-44	☐ Male
☐ Delridge	☐ Northeast	☐ American Indian or Alaska Native	☐ 45-64	☐ Transgender
☐ East District	☐ Southeast	☐ Asian	☐ 65 +	☐ Prefer not to identify
☐ Greater Duwamish	☐ Southwest	☐ Native Hawaiian or other Pacific Islander	☐ Prefer not to identify	
☐ King County (outside Seattle)		☐ Hispanic or Latino		
☐ Prefer not to identify		☐ Prefer not to identify		

Neighborhood		Race/Ethnicity	Age	Gender
☐ Ballard	☐ Lake Union	☐ White	☐ Under 18	☑ Female
☑ Central	☐ North	☑ Black or African American	☐ 18-44	☐ Male
☐ Delridge	☐ Northeast	☐ American Indian or Alaska Native	☐ 45-64	☐ Transgender
☐ East District	☐ Southeast	☐ Asian	☑ 65 +	☐ Prefer not to identify
☐ Greater Duwamish	☐ Southwest	☐ Native Hawaiian or other Pacific Islander	☐ Prefer not to identify	
☐ King County (outside Seattle)		☐ Hispanic or Latino		
☐ Prefer not to identify		☐ Prefer not to identify		

Neighborhood		Race/Ethnicity	Age	Gender
☐ Ballard	☐ Lake Union	☐ White	☐ Under 18	☑ Female
☑ Central	☐ North	☑ Black or African American	☐ 18-44	☐ Male
☐ Delridge	☐ Northeast	☐ American Indian or Alaska Native	☑ 45-64	☐ Transgender
☐ East District	☐ Southeast	☐ Asian	☐ 65 +	☐ Prefer not to identify
☐ Greater Duwamish	☐ Southwest	☐ Native Hawaiian or other Pacific Islander	☐ Prefer not to identify	
☐ King County (outside Seattle)		☐ Hispanic or Latino		
☐ Prefer not to identify		☐ Prefer not to identify		

Neighborhood		Race/Ethnicity	Age	Gender
☐ Ballard	☐ Lake Union	☐ White	☐ Under 18	☐ Female
☐ Central	☐ North	☒ Black or African American	☐ 18-44	☒ Male
☒ Delridge	☐ Northeast	☐ American Indian or Alaska Native	☒ 45-64	☐ Transgender
☐ East District	☐ Southeast	☐ Asian	☐ 65 +	☐ Prefer not to identify
☐ Greater Duwamish	☐ Southwest	☐ Native Hawaiian or other Pacific Islander	☐ Prefer not to identify	
☐ King County (outside Seattle)		☐ Hispanic or Latino		
☐ Prefer not to identify		☐ Prefer not to identify		

Neighborhood		Race/Ethnicity	Age	Gender
☐ Ballard	☐ Lake Union	☐ White	☐ Under 18	☐ Female
☒ Central	☐ North	☒ Black or African American	☐ 18-44	☒ Male
☐ Delridge	☐ Northeast	☐ American Indian or Alaska Native	☒ 45-64	☐ Transgender
☐ East District	☐ Southeast	☐ Asian	☐ 65 +	☐ Prefer not to identify
☐ Greater Duwamish	☐ Southwest	☐ Native Hawaiian or other Pacific Islander	☐ Prefer not to identify	
☐ King County (outside Seattle)		☐ Hispanic or Latino		
☐ Prefer not to identify		☐ Prefer not to identify		

Neighborhood		Race/Ethnicity	Age	Gender
☐ Ballard	☐ Lake Union	☐ White	☐ Under 18	☐ Female
☒ Central	☐ North	☒ Black or African American	☐ 18-44	☒ Male
☐ Delridge	☐ Northeast	☐ American Indian or Alaska Native	☐ 45-64	☐ Transgender
☐ East District	☐ Southeast	☐ Asian	☒ 65 +	☐ Prefer not to identify
☐ Greater Duwamish	☐ Southwest	☐ Native Hawaiian or other Pacific Islander	☐ Prefer not to identify	
☐ King County (outside Seattle)		☐ Hispanic or Latino		
☐ Prefer not to identify		☐ Prefer not to identify		

Neighborhood		Race/Ethnicity	Age	Gender
☐ Ballard	☐ Lake Union	☐ White	☐ Under 18	☐ Female
☒ Central	☐ North	☒ Black or African American	☐ 18-44	☒ Male
☐ Delridge	☐ Northeast	☐ American Indian or Alaska Native	☒ 45-64	☐ Transgender
☐ East District	☐ Southeast	☐ Asian	☐ 65 +	☐ Prefer not to identify
☐ Greater Duwamish	☐ Southwest	☐ Native Hawaiian or other Pacific Islander	☐ Prefer not to identify	
☐ King County (outside Seattle)		☐ Hispanic or Latino		
☐ Prefer not to identify		☐ Prefer not to identify		

Neighborhood		Race/Ethnicity	Age	Gender
☐ Ballard	☐ Lake Union	☐ White	☐ Under 18	☐ Female
☒ Central	☐ North	☒ Black or African American	☐ 18-44	☒ Male
☐ Delridge	☐ Northeast	☐ American Indian or Alaska Native	☐ 45-64	☐ Transgender
☐ East District	☐ Southeast	☐ Asian	☒ 65 +	☐ Prefer not to identify
☐ Greater Duwamish	☐ Southwest	☐ Native Hawaiian or other Pacific Islander	☐ Prefer not to identify	
☐ King County (outside Seattle)		☐ Hispanic or Latino		
☐ Prefer not to identify		☐ Prefer not to identify		

Neighborhood		Race/Ethnicity	Age	Gender
☐ Ballard	☐ Lake Union	☒ White	☐ Under 18	☒ Female
☒ Central	☐ North	☐ Black or African American	☐ 18-44	☐ Male
☐ Delridge	☐ Northeast	☐ American Indian or Alaska Native	☐ 45-64	☐ Transgender
☐ East District	☐ Southeast	☐ Asian	☒ 65 +	☐ Prefer not to identify
☐ Greater Duwamish	☐ Southwest	☐ Native Hawaiian or other Pacific Islander	☐ Prefer not to identify	
☐ King County (outside Seattle)		☐ Hispanic or Latino		
☐ Prefer not to identify		☐ Prefer not to identify		

Neighborhood		Race/Ethnicity	Age	Gender
☐ Ballard	☐ Lake Union	☑ White	☐ Under 18	☑ Female
☑ Central	☐ North	☐ Black or African American	☐ 18-44	☐ Male
☐ Delridge	☐ Northeast	☐ American Indian or Alaska Native	☑ 45-64	☐ Transgender
☐ East District	☐ Southeast	☐ Asian	☐ 65 +	☐ Prefer not to identify
☐ Greater Duwamish	☐ Southwest	☐ Native Hawaiian or other Pacific Islander	☐ Prefer not to identify	
☐ King County (outside Seattle)		☐ Hispanic or Latino		
☐ Prefer not to identify		☐ Prefer not to identify		

Neighborhood		Race/Ethnicity	Age	Gender
☐ Ballard	☐ Lake Union	☐ White	☐ Under 18	☐ Female
☐ Central	☐ North	☐ Black or African American	☑ 18-44	☑ Male
☐ Delridge	☐ Northeast	☑ American Indian or Alaska Native	☐ 45-64	☐ Transgender
☐ East District	☐ Southeast	☐ Asian	☐ 65 +	☐ Prefer not to identify
☐ Greater Duwamish	☐ Southwest	☐ Native Hawaiian or other Pacific Islander	☐ Prefer not to identify	
☐ King County (outside Seattle)		☐ Hispanic or Latino		
☐ Prefer not to identify		☐ Prefer not to identify		

International District

Neighborhood		Race/Ethnicity	Age	Gender
☐ Ballard	☐ Lake Union	☑ White	☐ Under 18	☐ Female
☐ Central	☐ North	☐ Black or African American	☐ 18-44	☑ Male
☐ Delridge	☐ Northeast	☐ American Indian or Alaska Native	☐ 45-64	☐ Transgender
☐ East District	☐ Southeast	☐ Asian	☑ 65 +	☐ Prefer not to identify
☐ Greater Duwamish	☐ Southwest	☐ Native Hawaiian or other Pacific Islander	☐ Prefer not to identify	
☐ King County (outside Seattle)		☐ Hispanic or Latino		
☐ Prefer not to identify		☐ Prefer not to identify		

CID

Neighborhood		Race/Ethnicity	Age	Gender
☐ Ballard	☐ Lake Union	☑ White	☐ Under 18	☐ Female
☐ Central	☐ North	☐ Black or African American	☐ 18-44	☑ Male
☐ Delridge	☐ Northeast	☐ American Indian or Alaska Native	☒ 45-64	☐ Transgender
☐ East District	☐ Southeast	☐ Asian	☐ 65 +	☐ Prefer not to identify
☐ Greater Duwamish	☐ Southwest	☐ Native Hawaiian or other Pacific Islander	☐ Prefer not to identify	
☒ south in seattle CID ☐ King County (outside Seattle)		☐ Hispanic or Latino		
☐ Prefer not to identify		☐ Prefer not to identify		

Neighborhood		Race/Ethnicity	Age	Gender
☐ Ballard	☐ Lake Union	☐ White	☐ Under 18	☐ Female
☐ Central	☑ North	☐ Black or African American	☐ 18-44	☐ Male
☐ Delridge	☐ Northeast	☐ American Indian or Alaska Native	☐ 45-64	☐ Transgender
☐ East District	☐ Southeast	☐ Asian	☐ 65 +	☑ Prefer not to identify
☐ Greater Duwamish	☐ Southwest	☐ Native Hawaiian or other Pacific Islander	☑ Prefer not to identify	
☐ King County (outside Seattle)		☐ Hispanic or Latino		
☐ Prefer not to identify		☑ Prefer not to identify		

Neighborhood		Race/Ethnicity	Age	Gender
☐ Ballard	☐ Lake Union	☐ White	☐ Under 18	☑ Female
☐ Central	☐ North	☐ Black or African American	☑ 18-44	☐ Male
☐ Delridge	☐ Northeast	☐ American Indian or Alaska Native	☐ 45-64	☐ Transgender
☐ East District	☐ Southeast	☑ Asian	☐ 65 +	☐ Prefer not to identify
☐ Greater Duwamish	☐ Southwest	☐ Native Hawaiian or other Pacific Islander	☐ Prefer not to identify	
☑ King County (outside Seattle)		☐ Hispanic or Latino		
☐ Prefer not to identify		☐ Prefer not to identify		

APPENDIX E: ALL INDIVIDUAL COMMENTS RECEIVED

ALL COMMENTS RECEIVED ON LPR

ID: 75

Submitted Through: Focus Group 2

Date: 11/20/2018

Which surveillance technology that is currently open for public comment, do you wish to comment on?

SDOT: Traffic Cameras

Do you have concerns about this specific technology or how it is used?

What value do you think this technology brings to our city?

What worries you about how this is used?

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

Using for pedestrians could require facial recognition – problematic

---

ID: 74

Submitted Through: Focus Group 2

Date: 11/20/2018

Which surveillance technology that is currently open for public comment, do you wish to comment on?

SDOT: Traffic Cameras

Do you have concerns about this specific technology or how it is used?

What value do you think this technology brings to our city?

What worries you about how this is used?

DRAFT

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

Seems like safeguards are sufficient w/ tripwire; quarantines – seem effective

---

ID: 73

Submitted Through: Focus Group 2

Date: 11/20/2018

Which surveillance technology that is currently open for public comment, do you wish to comment on?

SDOT: Traffic Cameras

Do you have concerns about this specific technology or how it is used?

What value do you think this technology brings to our city?

What worries you about how this is used?

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

Don't have time to access site to watch cameras

ID: 72

Submitted Through: Focus Group 2

Date: 11/20/2018

Which surveillance technology that is currently open for public comment, do you wish to comment on?

SDOT: Traffic Cameras

DRAFT

Do you have concerns about this specific technology or how it is used?

What value do you think this technology brings to our city?

What worries you about how this is used?

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

Brings more info and more data that is positive

ID: 71

Submitted Through: Focus Group 2

Date: 11/20/2018

Which surveillance technology that is currently open for public comment, do you wish to comment on?

SDOT: Traffic Cameras

Do you have concerns about this specific technology or how it is used?

What value do you think this technology brings to our city?

What worries you about how this is used?

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

Not happy w/ Red light cameras. Hesitant but supportive.

ID: 70

Submitted Through: Focus Group 2

Date: 11/20/2018

DRAFT

Which surveillance technology that is currently open for public comment, do you wish to comment on?

SDOT: Traffic Cameras

Do you have concerns about this specific technology or how it is used?

What value do you think this technology brings to our city?

What worries you about how this is used?

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

Fine except if abused

ID: 69

Submitted Through: Focus Group 2

Date: 11/20/2018

Which surveillance technology that is currently open for public comment, do you wish to comment on?

SDOT: Traffic Cameras

Do you have concerns about this specific technology or how it is used?

What value do you think this technology brings to our city?

What worries you about how this is used?

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

As long as not used to imitate enforcement. If you could use to suboena then not ok

---

DRAFT

ID: 68

Submitted Through: Focus Group 2

Date: 11/20/2018

Which surveillance technology that is currently open for public comment, do you wish to comment on?

SDOT: Traffic Cameras

Do you have concerns about this specific technology or how it is used?

What value do you think this technology brings to our city?

What worries you about how this is used?

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

Fantastic - except for possible abuse. Hacking into system to abuse data

---

ID: 67

Submitted Through: Focus Group 2

Date: 11/20/2018

Which surveillance technology that is currently open for public comment, do you wish to comment on?

SDOT: Traffic Cameras

Do you have concerns about this specific technology or how it is used?

Pedestrian flow, where construction, road closed, and fire or emergency blockage

What value do you think this technology brings to our city?

What worries you about how this is used?

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

DRAFT

Do you have any other comments?

ID: 64

Submitted Through: Focus Group 1

Date: 11/8/2018

Which surveillance technology that is currently open for public comment, do you wish to comment on?

SDOT: Traffic Cameras

Do you have concerns about this specific technology or how it is used?

it is easy to change images

What value do you think this technology brings to our city?

good to enforce traffic violations

What worries you about how this is used?

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

ID: 10336588011

Submitted Through: Survey Monkey

Date: 11/8/2018 4:15:19 PM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

SDOT: Traffic Cameras

Do you have concerns about this specific technology or how it is used?

No think we need more

What value do you think this technology brings to our city?

DRAFT

Yes

What worries you about how this is used?

Storage management

What recommendations would you give policy makers at the City about this technology?

Adding camera locations

Can you imagine another way to solve the problem this technology solves?

traffic and aiding the fire police as needed

Do you have any other comments?

ID: 10335686465

Submitted Through: Survey Monkey

Date: 11/8/2018 10:08:11 AM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

SDOT: Traffic Cameras

Do you have concerns about this specific technology or how it is used?

Is there any compelling evidence that th cameras and real-ttime info make streets safer for ALL users (including people walki g or biking or on transit), or that they actually mitigate traffic? If not, what tools DO accomplish this, what data supports that, and if we aren't using more effective tools, why not?

What value do you think this technology brings to our city?

See above. It may not. How do we know if it does?

What worries you about how this is used?

See above. Resources potentially used for ineffective tools.

What recommendations would you give policy makers at the City about this technology?

Show us that it works especially with regards to safety, and that it is worth the cost.

Can you imagine another way to solve the problem this technology solves?

DRAFT

Design our roads to discourage speeding, which would reduce crashes, which would reduce backups, which is proven to work, and would make conditions more welcoming for walking biking and transit. More transit priority. Communication in which the city actively and continually encourages less driving and more multi modal options. Frame every communication to reduce car dependence.

Do you have any other comments?

Put people first, not low-occupancy vehicles.

ID: 10333612996

Submitted Through: Survey Monkey

Date: 11/7/2018 4:21:41 PM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

SDOT: Traffic Cameras

Do you have concerns about this specific technology or how it is used?

1) Lack of a strong audit trail/inability to detect anomalous use/mis-use/abuse of the technology. Specifically: a) Moving cameras from their presets isn't logged and b) Stopping/restarting camera streams to the public isn't logged. (So there's also no way to apply anomaly detection to the logs to find abuse.) 2) Lack of granular access control for the camera management software (Cameleon). All users of Cameleon can move the cameras even if they don't require that for their job function and even though the policy is for such users to call the SDOT TOC and have the TOC move the camera. The software should align with policy. If only the TOC is supposed to move the camera, then only the SDOT TOC should be allowed to (or at least no non-SDOT departments should be allowed to move the cameras). 3) Use of the traffic cameras to monitor and record peaceful protesters/lawful freedom of assembly/speech, causing some citizens to be silenced and not attend/participate is such legal activities for fear of being tracked and recorded by the City.

What value do you think this technology brings to our city?

What worries you about how this is used?

Lack of an audit trail, risk for abuse, and silencing citizens (see #2 for more details).

What recommendations would you give policy makers at the City about this technology?

1) Cameleon likely needs a deeper security review and security enhancements made to the software. 2) Perhaps a policy-based change such that at least for known-in-advance protests with known routes, that either cameras won't face the protest routes and/or that no recordings from those cameras will be

DRAFT

permitted for the duration of the protest (even better if these policy changes were enforced by the software, Cameleon).

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

I appreciate the honesty and openness SDOT gave regarding this technology at one of the community engagement meetings.

ID: 10326861272

Submitted Through: Survey Monkey

Date: 11/5/2018 9:28:21 AM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

SDOT: Traffic Cameras

Do you have concerns about this specific technology or how it is used?

No concerns. I use the traffic cameras to check commute and travel times almost daily.

What value do you think this technology brings to our city?

Traffic is a nightmare in/around Seattle. Traffic cameras help me make decisions regarding my commute or travel - as a commuter who takes the bus, traffic cameras and the SDOT Twitter feed allow me to change my bus riding times or bus route depending on traffic.

What worries you about how this is used?

Nothing. If the police or government agencies want to use traffic cameras, go for it.

What recommendations would you give policy makers at the City about this technology?

None.

Can you imagine another way to solve the problem this technology solves?

Nope.

Do you have any other comments?

DRAFT

ID: 10326775821

Submitted Through: Survey Monkey

Date: 11/5/2018 9:00:25 AM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

SDOT: Traffic Cameras

Do you have concerns about this specific technology or how it is used?

No

What value do you think this technology brings to our city?

Enabling faster incident response, better information for commuters, and assistance in law enforcement/catching criminals.

What worries you about how this is used?

Theoretically, these cameras can enable a totalitarian police state. But we do not live in a totalitarian police state. So the benefits outweigh the costs. If the city misuses the technology, we will democratically replace its leadership.

What recommendations would you give policy makers at the City about this technology?

Keep them. Expand them if necessary. Always be transparent about how the cameras are used. Never hide intentional or actual usage. The moment you misuse them or try to cover up misuse-even unintentional misuse-the cameras become untenable.

Can you imagine another way to solve the problem this technology solves?

No

Do you have any other comments?

To reiterate: be open and transparent about where the cameras are and how they are used. Be open and transparent about any misuse and hold misuse accountable. We will replace, democratically, city leadership that fails to be transparent about how the cameras are used.

ID: 10324616636

Submitted Through: Survey Monkey

Date: 11/4/2018 4:37:24 AM

DRAFT

Which surveillance technology that is currently open for public comment, do you wish to comment on?

SDOT: Traffic Cameras

Do you have concerns about this specific technology or how it is used?

What value do you think this technology brings to our city?

What worries you about how this is used?

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

ID: 10307031457

Submitted Through: Survey Monkey

Date: 10/26/2018 6:54:15 PM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

SDOT: Traffic Cameras

Do you have concerns about this specific technology or how it is used?

Photo timing is unreliable. E.g., off and on settings don't adhere to school hours on North Greenwood & 135th.

What value do you think this technology brings to our city?

Helps lower traffic violations.

What worries you about how this is used?

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

DRAFT

ALL COMMENTS RECEIVED ON GENERAL SURVEILLANCE

ID: 66

Submitted Through: Focus Group 1

Date: 11/8/2018

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

no. Glad some surveillance is being used.

What value do you think this technology brings to our city?

What worries you about how this is used?

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

ID: 65

Submitted Through: Focus Group 1

Date: 11/8/2018

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

What value do you think this technology brings to our city?

What worries you about how this is used?

What recommendations would you give policy makers at the City about this technology?

DRAFT

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

Technologies discussed are less dangerous then some other technologies in our personal lives

---

ID: 63

Submitted Through: Focus Group 1

Date: 11/8/2018

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

not a lot of privacy anymore: google earth, maps, streetview

What value do you think this technology brings to our city?

What worries you about how this is used?

Google home is always listening. There is always someone listening to your conversations.

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

Some of the images you can find online appear to be voyerism

ID: 61

Submitted Through: Focus Group 1

Date: 11/8/2018

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

DRAFT

Do you have concerns about this specific technology or how it is used?

What value do you think this technology brings to our city?

What worries you about how this is used?

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

Street sweepers coming in the middle of the night are ineffective, cars are parked and blocking areas

---

ID: 60

Submitted Through: Focus Group 1

Date: 11/8/2018

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

Sometimes too much surveillance

What value do you think this technology brings to our city?

What worries you about how this is used?

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

Curious about how much construction has to pay when blocking off half a block for parking.

ID: 56

Submitted Through: Mail

Date: 10/23/2018

DRAFT

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

What value do you think this technology brings to our city?

What worries you about how this is used?

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

Surveillance. I don't want it. Any of it. Just stop.

ID: 28

Submitted Through: Meeting 2

Date: 10/25/2018

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

What value do you think this technology brings to our city?

What worries you about how this is used?

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

Can you please do a better job telling the public about these meetings? Targeted Ads? KUOW - helped, Blogs, Newspaper - Poor turnout

---

ID: 27

DRAFT

Submitted Through: Meeting 2

Date: 10/25/2018

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

What value do you think this technology brings to our city?

What worries you about how this is used?

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

Most too technical and need to communicate better with public

---

ID: 26

Submitted Through: Meeting 2

Date: 10/25/2018

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

Concerned about aggregation of technology and data collected

What value do you think this technology brings to our city?

What worries you about how this is used?

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

DRAFT

More transparent; less defnesive is how you gain trust

ID: 25

Submitted Through: Meeting 2

Date: 10/25/2018

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

What value do you think this technology brings to our city?

What worries you about how this is used?

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

KC Parcel viewer information is too much. State listings of addresses of voters is a problem. Too much info has impact on DV victims - keeping them from voting

---

ID: 24

Submitted Through: Meeting 2

Date: 10/25/2018

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

What value do you think this technology brings to our city?

What worries you about how this is used?

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

DRAFT

Do you have any other comments?

Work and Human Rights Activist- Process too complicated. Can be benign but SPD doesn't make dark usage more clear. Info is too complex/data need better education for public on technologies.

ID: 23

Submitted Through: Meeting 2

Date: 10/25/2018

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

No concerns as a professor. Traffic is getting worse - how do we make imporvements. How do we use data in other ways to improve our lives?

What value do you think this technology brings to our city?

Impressed by how City handles data - Check it and Chuck it

What worries you about how this is used?

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

Spent time on dark web and stunned by what they can do

ID: 53

Submitted Through: Meeting 4

Date: 10/30/2018

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

DRAFT

What value do you think this technology brings to our city?

What worries you about how this is used?

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

People lose track of "public service" being performed. Misuse of data

---

ID: 52

Submitted Through: Meeting 4

Date: 10/30/2018

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

What value do you think this technology brings to our city?

What worries you about how this is used?

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

Hate to go "China route" tied to credit

ID: 51

Submitted Through: Meeting 4

Date: 10/30/2018

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

DRAFT

Do you have concerns about this specific technology or how it is used?

What value do you think this technology brings to our city?

What worries you about how this is used?

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

Restricted use: will it generate income? Mission creep. Report back to community

---

ID: 10334071978

Submitted Through: Survey Monkey

Date: 11/7/2018 9:41:13 PM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

Yes

What value do you think this technology brings to our city?

Minimal

What worries you about how this is used?

Very concerned about how red light enforcement cameras are racially unjust and frequently cause tickets to be issued to people of color.

What recommendations would you give policy makers at the City about this technology?

Remove red light cameras, if a particular intersection requires policing then assign officers to be posted there to create a presence that can be seen.

Can you imagine another way to solve the problem this technology solves?

Use officers in cars.

Do you have any other comments?

DRAFT

Red light cameras create an unjust, racially imbalanced burden on blacks, latinos and other marginalized groups. They should be eliminated from the city.

ID: 10328244312

Submitted Through: Survey Monkey

Date: 11/5/2018 8:41:00 PM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

What value do you think this technology brings to our city?

What worries you about how this is used?

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

We, the Critical Platform Studies Group, are a collective of researchers at the University of Washington Information School conducting a third-party ethnographic research study of the Seattle Surveillance Ordinance. In our ongoing research, we are conducting interviews with stakeholders on the processes leading to the revised Seattle Surveillance Ordinance. We have also compared the law to similar U.S. initiatives, and analyzed the functionality of each technology covered by Seattle's ordinance. Despite the salience of algorithmic processes in surveillance technologies, we are finding that the ordinance does not describe or address machine learning, artificial intelligence (AI), or algorithmic bias. We conclude that there is a pressing need for attention to algorithmic bias within disclosed surveillance technologies, for which we suggest additional elements be added to Seattle Surveillance Impact Reports, or by expanded stakeholder engagement in the RFP stage of the procurement process. Our preliminary findings that lead to these recommendations are as follows: *Expanded use of technologies triggers new surveillance review*: The Seattle ordinance models a strong process for submitting a given to technology to further review in the event its functionality or uses are expanded. *Law motivated by concern for marginalized groups*: The motivation for the Seattle Surveillance Ordinance was to protect groups that have historically been targeted by surveillance programs. Given that the implicit biases that have been demonstrated to exist in algorithmic systems invariably affect marginalized groups, it is critical to consider the algorithmic aspects and potential algorithmic biases in disclosed surveillance technologies. *Gap between perception and reality of current machine learning use*: Three municipal employees familiar with the Surveillance program stated that machine learning technologies are not used in technologies on the Master List. Contrary to these statements we found that at least two technologies on the Master List rely on machine algorithms---Automated License Plate Recognition (ALPR) and Booking Photo Comparison Software (BPCS). We found that at least two other technologies

on the Master List rely on AI technology that could also be used long term in a way that implicates protected groups---i2 iBase and Maltego. The reliance on machine learning technologies likely introduces algorithmic bias, such as through "false positive" identifications. *Absence of algorithmic considerations in other surveillance ordinances*: None of the six municipal surveillance ordinances we surveyed included language for wrestling with algorithmic bias. *Opportunity to strengthen existing processes*: The Seattle Surveillance Impact Reports could include questions or prompts that would target and stimulate investigation into machine learning / AI facets or into algorithmic bias in disclosed surveillance technologies.

ID: 10326819811

Submitted Through: Survey Monkey

Date: 11/5/2018 9:14:43 AM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

Adaptive signal technology does not seem ready for a multimodal city where bikes/pedestrians need priority.

What value do you think this technology brings to our city?

It can potentially improve mobility and that has certainly been demonstrated for cars at least.

What worries you about how this is used?

It doesn't account for bikes or pedestrians or requires some sort of additional effort (like installing an app) to work for those groups.

What recommendations would you give policy makers at the City about this technology?

Are these technologies helping or hurting the vision zero goals?

Can you imagine another way to solve the problem this technology solves?

I would question whether cars being in gridlock is a problem that can be solved or simply a consequence of the culture that we are encouraging in a dense city.

Do you have any other comments?

ID: 10326707921

Submitted Through: Survey Monkey

DRAFT

Date: 11/5/2018 8:38:49 AM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

No

What value do you think this technology brings to our city?

As our population grows this is the only way to enforce laws as we don't have enough police to do it

What worries you about how this is used?

None. If you're abiding by the law you have nothing to fear

What recommendations would you give policy makers at the City about this technology?

Allow police to use it to their advantage to do their job to keep us all safe, but don't use it against them!

Can you imagine another way to solve the problem this technology solves?

Create an environment that would make police want to stay in Seattle and do the job they were hired to do.

Do you have any other comments?

See above

ID: 10324587536

Submitted Through: Survey Monkey

Date: 11/4/2018 3:55:12 AM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

What value do you think this technology brings to our city?

DRAFT

License plate cameras in general, I'm supportive of, if they can be used at greater frequency to crack down on illegal parking and driving.

What worries you about how this is used?

What recommendations would you give policy makers at the City about this technology?

Full steam ahead! Bus lane camera on every bus, so that operators can push a button to send video of an illegal bus lane violator or other moving/parking violations when they see one, to get folks to drive better.

Can you imagine another way to solve the problem this technology solves?

Literally no.

Do you have any other comments?

I have no worries about these technologies. Get bus cameras online ASAP.

ID: 10322210731

Submitted Through: Survey Monkey

Date: 11/2/2018 9:47:34 AM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

This is government overreach and Big Brother at it's finest. Surveillance technologies do not belong in a free society and are solely implemented to farm money from taxpayers for minor infractions, at "best".

What value do you think this technology brings to our city?

None; outside of the ticket-issuing racket.

What worries you about how this is used?

Law Enforcement will abuse this technology. As a prior victim of stalking at the hands of a Law Enforcement Officer, we don't need to give Police more surveillance tools which make it easier to harass citizens.

What recommendations would you give policy makers at the City about this technology?

DRAFT

Do not turn Seattle into Singapore, China, or the United Kingdom. America is The Land of the Free. We don't want to be under the Watchful Eye of Big Brother.

Can you imagine another way to solve the problem this technology solves?

Use your eyes and have officers enforce the law as needed.

Do you have any other comments?

Robots are not Sworn Officers of the Law. SPD should be writing tickets, not computers. This technology will likely be abused, it will violate privacy laws, and I don't trust the Government to keep secure such a Mass Surveillance system. The costs of securing and maintaining such a system will require massive amounts of artificial "ticketing". At best, this is a Perpetual Revenue Generator for City Hall; at worst, it's a Gross Violation of Our Civil Rights.

ID: 10315099454

Submitted Through: Survey Monkey

Date: 10/30/2018 7:57:58 PM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

No

What value do you think this technology brings to our city?

Hi it brings proof. It impacts crime before it occurs.

What worries you about how this is used?

Mone

What recommendations would you give policy makers at the City about this technology?

Where you see lots of camera you see less crime.

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

ID: 10314183202

DRAFT

Submitted Through: Survey Monkey

Date: 10/30/2018 12:34:32 PM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

What value do you think this technology brings to our city?

What worries you about how this is used?

The location of the cameras/where the police vans circulate can be racially discriminatory. The city should make sure that these are distributed equitably.

What recommendations would you give policy makers at the City about this technology?

If the city is already going to be placing these cameras, they should also use these cameras to enforce speeding violations. Cars are always driving dangerously fast in this city, and these cameras should also make people follow the law.

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

ID: 10312185174

Submitted Through: Survey Monkey

Date: 10/29/2018 7:45:04 PM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

Yes

What value do you think this technology brings to our city?

What worries you about how this is used?

DRAFT

Over-policing. Waste of tax money. City government probably isn't sufficiently organized or skilled to process and analyze the data collected. It will ultimately lead to more overly bureaucratic, under-skilled, departments hopelessly trying to learn how to use the equipment and manage a massive records collection. The City should think twice before tying their shoes together on this one. It won't turn out well. I suggest you save yourselves the headache and bad PR by abandoning any surveillance plans now.

What recommendations would you give policy makers at the City about this technology?

Fire whoever is responsible for trying to waste tax money on invasive surveillance equipment. Also, whoever wrote question #6 should take a course on writing unbiased survey questions because the question assumes that the proposed surveillance equipment in fact solves a problem but that is not an established truth.

Can you imagine another way to solve the problem this technology solves?

This is a loaded question. It does not solve a problem. It creates an IT nightmare, costs way too much to store the data, invasive surveillance, and bad PR. Eventually, someone involved will likely lose a future election as a result.

Do you have any other comments?

ID: 10312163737

Submitted Through: Survey Monkey

Date: 10/29/2018 7:35:08 PM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

Yes, I don't agree on public surveillance. This is America not China!

What value do you think this technology brings to our city?

I think it strips me from my right as a citizen and make me feel like the whole country is big huge jail

What worries you about how this is used?

How it's interpret and what people of color will have to go through to not been punished for small and trivial crimes.

What recommendations would you give policy makers at the City about this technology?

We're not ready, this is not London. Don't do it!

DRAFT

Can you imagine another way to solve the problem this technology solves?

I don't think it's solving a problem as much as it's creating one.

Do you have any other comments?

Don't do it!

ID: 10310577035

Submitted Through: Survey Monkey

Date: 10/29/2018 8:13:55 AM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

Yes, the police are not honest about how and when they use this technology which means they are violating the 4th amendment rights which is a federal offense. Are they held accountable? No, almost never.

What value do you think this technology brings to our city?

The percentage of crimes solved with these technologies is a very small amount. And violating 4th amendment rights is a normal act by police in many of those instances.

What worries you about how this is used?

I support the pursuit of justice to make our city safer but but lawful citizens and criminals all have rights which the police disregard because there is no price to pay. If you could cheat and got caught doing so but there was no consequences, why wouldn't you? Its examples like this in our leaders, public officials and public servants that have eroded society and the trust people in each other.

What recommendations would you give policy makers at the City about this technology?

Until we have good honest leaders at the top who oversee the ones who use these technologies and who have no bias about who is held accountable for violations of ANY kind, they should be sidelined.

Can you imagine another way to solve the problem this technology solves?

Good morals and the respect for your fellow humans. It starts with the people on top to set good examples. We as a society have gotten more numb to violence, dishonesty and corruption at the highest

DRAFT

levels ,it has now sown itself into our way of life. If we see this kind of behavior from the people that are "roll models" or "leaders" then we adopt them as our own values.

Do you have any other comments?

Unfortunately, corruption is widespread in government agencies and public enterprises. Our political system promotes nepotism and wasting money. This has undermined our legal system and confidence in the functioning of the state. Communism is the corruption of a dream of justice.

ID: 10307049643

Submitted Through: Survey Monkey

Date: 10/26/2018 7:08:32 PM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

I need the red light cameras NOT to have flash equipment on them. These lights are too bright, and they flash without warning, blinding people on the sidewalks at intersections.

What value do you think this technology brings to our city?

Damn all. It may be that drivers get citations--but this does not compensate for the blinding of pedestrians, bicyclists, etc.

What worries you about how this is used?

I have several times been so bedazzled and startled that I might easily have stumbled into traffic, if I'd chanced to be closer to the curb.

What recommendations would you give policy makers at the City about this technology?

Get cameras that don't need so much light, if you INSIST on having such cameras.

Can you imagine another way to solve the problem this technology solves?

Since I don't think it solves anything, no.

Do you have any other comments?

Other cameras are intrusive and invasive--but they're not so immediately dangerous, generally.

DRAFT

ID: 10307028243

Submitted Through: Survey Monkey

Date: 10/26/2018 6:42:15 PM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

None of these technologies are novel, particularly compared to other parts of the world (Europe, Asia). However, the use of the automated parking enforcement technology specifically for the purpose of booting cars is of highly questionable value.

What value do you think this technology brings to our city?

Hopefully some efficiencies in reducing human effort required to perform basic data-gathering and enforcement. If the parking enforcement buggies can cover many more blocks in a day, or a police officer yanks someone out of a car that's actually stolen, great!

What worries you about how this is used?

Abuse of data access, lax enforcement of retention and removal-of-access policies, above SECURITY BREACH OF DATA that may be useful in some level of identification (car with plate X was seen at location Y at time Z). Be wary of social justice impacts, particularly of the auto-boot technology. Those who are the most vulnerable may be in more frequently trouble with the law (and absolutely unable to rectify fines) and would thus unable to reach services. It would be absolutely unacceptable if a vulnerable member of the population who may be living in a vehicle is booted and unable to access basic human services, or worse.

What recommendations would you give policy makers at the City about this technology?

Data security is of paramount importance -- if data cannot be handled safely by the right people at the right time with prompt removal processes for data and access, then none of this matters and the public trust is gone. If there are any questions about this whatsoever, do not proceed with adoption. After that is transparency. Be specific about what is gathered, down to individual data elements: publicly post the data schemas (but obviously not the data). E.g., when your license plate is recorded, it also gathers: date, time, location, and so on. Finally, policies about use must be clearly understood by the public and the civil servants the tech is entrusted too. "SPD may use tech [when] for [reason] in order to perform duty [elaborate]." "SDOT uses these cameras to perform analysis of [condition]". People care about access and retention policies in this day and age -- post them and perform routine audits no less than quarterly but ideally more often than that (again, posting results publicly).

Can you imagine another way to solve the problem this technology solves?

DRAFT

Drone-mounted cameras can be used to gather movement data for travel time analysis; this doesn't require the use or exposure of any identifying marks whatsoever. They may also be helpful for SFD response scenes to perform rapid large area surveys.

Do you have any other comments?

Addressing these topics with serious care and thoughtfulness raises chances of success. Be intentional about uses of these technologies and do not allow for hidden uses.

ID: 10307002973

Submitted Through: Survey Monkey

Date: 10/26/2018 6:13:10 PM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

Not particularly

What value do you think this technology brings to our city?

CCTV makes this city safer, particularly since we are so short of police officers.

What worries you about how this is used?

Nothing

What recommendations would you give policy makers at the City about this technology?

Beat policemen are better.

Can you imagine another way to solve the problem this technology solves?

Policemen/women who walk or ride bikes in the same neighborhood on a daily basis. We've all read English novels. Doesn't the bobby on his beat seem like the best way to protect a neighborhood, and make a neighborhood feel safe?

Do you have any other comments?

I've lived in Ballard for 35 years. In the last five years I've put grates on my windows, bought a wrought-iron screen door, locked the gate to the backyard. This is after the theft of my bicycle from my shed, shoes from my porch, etc. Opioids. The government is cracking down on doctors who overprescribe.

DRAFT

How about cracking down on street drug dealers as well? If a bath tub is overflowing from two spigots going full blast, turning off only one of those spigots doesn't work. Gotta turn off both.

ID: 10306958976

Submitted Through: Survey Monkey

Date: 10/26/2018 5:25:35 PM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

I do have concerns. However, if there is public oversight of the surveillance technology used, both by elected officials and through releases of content recorded to the general public, then these concerns will be sufficiently addressed.

What value do you think this technology brings to our city?

I think this has the ability to automate many of the services currently done by the city. Further, it can provide hard evidence of events that occurred which human testimony cannot do.

What worries you about how this is used?

I am worried that these systems could be used by its operators to spy on people they know or to blackmail individuals both known and unknown to the operators. The accountability to elected officials and through releases to the public would prevent these things from happening.

What recommendations would you give policy makers at the City about this technology?

Make sure there is actual transparency and accountability to the general public and the press, and make sure this technology is about automation and providing evidence, not to keep tabs on people.

Can you imagine another way to solve the problem this technology solves?

no

Do you have any other comments?

ID: 10303980026

Submitted Through: Survey Monkey

Date: 10/25/2018 12:46:20 PM

DRAFT

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

I have concerns about the validity of Seattle's privacy program after listening to Seattle's Chief Privacy Officer on KUOW today. Per Ordinance 125376, greykey (the ability for the Seattle Govt to unlock iphones without having the password) should have been reviewed by the Privacy Officer Armbruster, but it wasn't and she provided no explanation why. She offered no apology. This lacks transparency and accountability.

What value do you think this technology brings to our city?

What worries you about how this is used?

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

ID: 10300614662

Submitted Through: Survey Monkey

Date: 10/24/2018 9:04:59 AM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

yes

What value do you think this technology brings to our city?

On a world level, at the federal government level, and at the city level we move closer towards fascism and other forms of authoritarianism, expanded surveillance will give expanded power to authoritarian regimes such as ours.

What worries you about how this is used?

DRAFT

The list of technologies for surveillance should include all other 'law' inforcement agencies at work in our city such as ICE.

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

As I sat down on the Seattle Trolley on Jackson Street a drone flew up and held stationary and then titled slightly up. The blue lens of a camera flashed and the drone banked off. I'd like to know what other technologies are at use in our city, by ICE for instance as well as other 'law' agencies.

ID: 10299219171

Submitted Through: Survey Monkey

Date: 10/23/2018 7:14:36 PM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

in general I'm concerned about the collection, retention, aggregation, sharing, and mining of information collected thru surveillance technologies, particularly with regard to the risk for abuse by agencies like ICE or other yet-to-be created Federal agencies that do not represent the views of the Seattle area population.

What value do you think this technology brings to our city?

Emergency Scene cameras give medical professional an opportunity to prepare for treating emergencies and protect first responders from frivolous lawsuits. Hazmat cams gather information while allowing humans to remain at a safe distance. The rest of them essentially allow the city to more effectively collect revenue, except for ALPR, which scans licenses in search of stolen cars or vehicles sought for other reasons.

What worries you about how this is used?

ALPR is essentially a surveillance dragnet. Data is retained for 90 days even on vehicles that have nothing to do with anything.

What recommendations would you give policy makers at the City about this technology?

Do not retain any ALPR data except that which pertains to tagged vehicles. In general, always err on the side of not collecting data, not storing it, and not sharing it. Please. I work for Google.

DRAFT

Can you imagine another way to solve the problem this technology solves?

Fund transportation infrastructure so we don't have so many cars on the road running traffic lights and hitting pedestrians and cyclists and being driven by drunks.

Do you have any other comments?

Thank you for the opportunity to comment.

ID: 10298281561

Submitted Through: Survey Monkey

Date: 10/23/2018 11:18:38 AM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

It seems like all of these technologies are primarily focused on the movement of vehicles through Seattle instead of pedestrians and their own needs

What value do you think this technology brings to our city?

Giving the illusion of gathering useful, but inactionable, data.

What worries you about how this is used?

general privacy concerns about collecting so much data. There's no such thing as perfect security, to say the least.

What recommendations would you give policy makers at the City about this technology?

Use it to benefit the most vulnerable road users: pedestrians, including cyclists and other small transport methods/vehicles.

Can you imagine another way to solve the problem this technology solves?

Does it solve things? It's a bit early to say that.

Do you have any other comments?

Stop focusing on car throughput, and instead focus on people.

DRAFT

ID: 10298170617

Submitted Through: Survey Monkey

Date: 10/23/2018 10:37:29 AM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

Can you quantify the # of crime investigations, stolen cars recovered and $ amount of traffic violations recovered by using the ALPR/LPR technology.

What value do you think this technology brings to our city?

I am concerned that we are trading our privacy for a "sense" of security. How have surveillance technologies incrementally affected our security in Seattle.

What worries you about how this is used?

slippery slope -- see "The Last Enemy" film

What recommendations would you give policy makers at the City about this technology?

I'd like to see more police body cams; less surveillance;

Can you imagine another way to solve the problem this technology solves?

I have not been convinced except in the case of the Fire Department technology that we are actually better off -- I need to see numbers.

Do you have any other comments?

I would like to see year over year numbers comparing "before technology - after technology"

ID: 10296707285

Submitted Through: Survey Monkey

Date: 10/22/2018 9:13:04 PM

DRAFT

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

The public ought to be made aware of all surveillance technologies being used. In the case of permanent fixed surveillance devices such as cameras, the public should be readily able to find information about where all such devices are installed.

What value do you think this technology brings to our city?

The provided examples of traffic monitoring seem useful. However, a full-blown security system similar to the widespread CCTV coverage in London seems overly pervasive.

What worries you about how this is used?

What recommendations would you give policy makers at the City about this technology?

Minimize the number of surveillance devices implemented, and make their locations available for online viewing by the public at any time. No surveillance devices should be installed without informing the public.

Can you imagine another way to solve the problem this technology solves?

Security cameras should be limited to guarding private property or specific locations of concern, and not used to generally monitor all public areas at all times.

Do you have any other comments?

ID: 10296428154

Submitted Through: Survey Monkey

Date: 10/22/2018 5:35:21 PM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

What value do you think this technology brings to our city?

What worries you about how this is used?

DRAFT

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

ID: 10295649414

Submitted Through: Survey Monkey

Date: 10/22/2018 11:24:46 AM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

I don't want any surveillance. Any of it. Let us live privately and in peace. Just stop.

What value do you think this technology brings to our city?

I don't want any surveillance. Any of it. Let us live privately and in peace. Just stop.

What worries you about how this is used?

I don't want any surveillance. Any of it. Let us live privately and in peace. Just stop.

What recommendations would you give policy makers at the City about this technology?

I don't want any surveillance. Any of it. Let us live privately and in peace. Just stop.

Can you imagine another way to solve the problem this technology solves?

I don't want any surveillance. Any of it. Let us live privately and in peace. Just stop.

Do you have any other comments?

I don't want any surveillance. Any of it. Let us live privately and in peace. Just stop.

ID: 10295424650

Submitted Through: Survey Monkey

DRAFT

Date: 10/22/2018 10:02:24 AM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

SPD has proved over decades that it should BE constantly monitored, rather than be further enabled to abuse - the inseparable seduction of its under-controlled power.

What value do you think this technology brings to our city?

Surveillance tech further dehumanizes and commoditizes residents. A better SPD investment would be in outside beat walking and mingling with citizens.

What worries you about how this is used?

SPD is under Federal oversight due to its documented abuses. Its modus operandi are Trumpist (i.e. thrive only in the dark). We have witness where that tends.

What recommendations would you give policy makers at the City about this technology?

No Councilperson can adequately oversee or hold accountable her portfolio, let alone the Mishmash and Safe Communities octopus. Until proven effective governance by elected officials obtains, no greater powers should be distributed to SPD.

Can you imagine another way to solve the problem this technology solves?

The morality police in Iran and Saudi Arabia and the like in China demonstrate that everyday citizens are readily induced to spy and report on their neighbors. Although beyond the pale, a progressive version of neighborly support and assistance should be the direction Seattle pioneers to deal with the pressing problems of Mass Humanity.

Do you have any other comments?

One cannot "tech" to a humanitarian city, least of all through an insidiously equipped praetorian armed force. SPD elevates the interests of its minuscule membership above those of a citizenry whose dwarf it in all regards. City Council year-in/year-out approves the contracts cementing this folly. Seattle needs a formal goal of reducing its separate-but-armed constituency into the service element it should be, not the formidable power-center it is.

ID: 10295330166

Submitted Through: Survey Monkey

Date: 10/22/2018 9:29:06 AM

DRAFT

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

Yes. We have crimes and shootings that occur in public areas where there is no reasonable expectation of privacy but we lack the info to respond effectively.

What value do you think this technology brings to our city?

By placing cameras in certain areas with frequent criminal activity we could both deter and aid in the arrest and prosecution of those responsible. The city is undergoing an epidemic of property crime and dumping of garbage in many areas. Cameras could help deter, aid in the arrest/fines and prosecution of those responsible.

What worries you about how this is used?

Very little. If used in public spaces there is no reasonable expectation of privacy. If there is concern about privacy or tracking, the data could be encrypted by default and then made available to police after an incident with a court order or approval of some oversight body.

What recommendations would you give policy makers at the City about this technology?

Hurry up and put cameras in place where it makes sense. If there are privacy concerns, implement some kind of a check on access but get moving.

Can you imagine another way to solve the problem this technology solves?

Not cost effectively.

Do you have any other comments?

ID: 10295152382

Submitted Through: Survey Monkey

Date: 10/22/2018 8:30:01 AM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

DRAFT

A person could be set up, I suppose. I just read that the journalist who was murdered in the embassy....well his ambushers had a double for him. Now whether this is true or not it could happen. Of course facial recognition might put a stop to imposters posing as someone else.

What value do you think this technology brings to our city?

Safety in public spaces is increased...although, it is sadly 'after the fact' that it is usually the most effective. I think that just the knowledge that you might be watched could deter criminal behavior or, for that matter, abuse by law enforcement. It works both ways. Also, if you had more speed detectors you could generate a lot of revenue with speeding tickets. I can't tell you the number of times I've had cars speed by me in neighborhoods where speed limits are 25 mph. I know police can't be everywhere...but cameras can be. People are much less respectful nowadays. I drive to neighborhoods all over Seattle 5 days a week as a caregiver and have people honking at me because I'm driving too slow for them. I wish I could take the Mayor along with me on some of my trips so she could see first hand how rude people can be.

What worries you about how this is used?

It will alleviate my worries about road rage....maybe make people feel safer walking about outside...especially those most vulnerable who stay cooped up in their homes too afraid to go outside.

What recommendations would you give policy makers at the City about this technology?

Please...more sir. I would love to see children outside playing...who aren't afraid of being outside playing...in quiet neighborhoods or parks. We need these cameras etc. if only to act as a babysitter in some respects.

Can you imagine another way to solve the problem this technology solves?

Change human nature....which is nearly impossible.

Do you have any other comments?

I'm sure there would be people who could try to use surveillance to watch women etc.....when I was younger I've had police pull me over I'm sure just to check me out...stupid weirdos....BUT there is a lot of good to be had with watching over the public for the public good

---

ID: 10291758143

Submitted Through: Survey Monkey

Date: 10/19/2018 2:19:06 PM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

No, I support surveillance cameras, even as I understand this is a tradeoff to privacy. But, CC TVs are widely accepted and extraordinarily helpful for law enforcement in other countries such as the UK.

What value do you think this technology brings to our city?

The ability to safeguard spaces and revisit victimizations.

What worries you about how this is used?

How long the data is kept. We should have a period of time that the data is kept after which it is destroyed.

What recommendations would you give policy makers at the City about this technology?

Adopt this widely.

Can you imagine another way to solve the problem this technology solves?

NO.

Do you have any other comments?

As a UW professor who studies law, I fully support better surveillance of our population--this includes police, citizens, and so on.

ID: 10287347565

Submitted Through: Survey Monkey

Date: 10/17/2018 9:55:10 PM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

No. Technology is ubiquitous; surveillance is everywhere. Technology plays a pivotal role in keeping our communities safe. The paranoia of some should be easily address by strong policies and auditing of use.

What value do you think this technology brings to our city?

Technology is critical to solving crime, deterring crime, and bringing criminals to justice, and providing closure to victims.

What worries you about how this is used?

DRAFT

I worry that it is not used enough. I live in the South End, yes, in a black community (I am black) and we have been pleading with the city (you, Councilmember Harrell) for cameras for years. The ACLU, and supposed "community activists", do not speak for the average among us who go to work, take our kids to school, and just want to live in a safe community.

What recommendations would you give policy makers at the City about this technology?

Lead. Do what you're paid to do. Protect the communities you serve, and allow - perhaps even enable - the police to keep our communities safe.

Can you imagine another way to solve the problem this technology solves?

A ridiculous question. If the city's not going to invest in a technological solution, why would the city invest in a lesser solution?

Do you have any other comments?

Please, do not hamstring our first responders anymore. Property crime is rampant. Auto theft is rampant. Our kids are being robbed on the street. And you want to TAKE AWAY tools to solve crime?? We want cameras - like we were promised, Councilmember Harrell. We want crimes solved, and deterred. Do not let absurdity rule the day.

ID: 10281389699

Submitted Through: Survey Monkey

Date: 10/15/2018 4:13:31 PM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

No

What value do you think this technology brings to our city?

Possible reduction in open street crimes

What worries you about how this is used?

May be comsidered not useful to detect crimes in low income communities.

What recommendations would you give policy makers at the City about this technology?

Use the technologies to cut down the kidnappers/rapist-- violent sex predators working and living in southend housing.

DRAFT

Can you imagine another way to solve the problem this technology solves?

Police patrols more often and seizure--not just showing up and leaving the scene.

Do you have any other comments?

The city seems to be over-run by kidnappers raping, I am getting sick to my stomach. Violent Sex Predators seem to be running the city via what I know.

ID: 10281279313

Submitted Through: Survey Monkey

Date: 10/15/2018 3:10:22 PM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

What value do you think this technology brings to our city?

What worries you about how this is used?

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

ID: 10273624842

Submitted Through: Survey Monkey

Date: 10/11/2018 1:35:22 PM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

DRAFT

What value do you think this technology brings to our city?

What worries you about how this is used?

What recommendations would you give policy makers at the City about this technology?

Can you imagine another way to solve the problem this technology solves?

Do you have any other comments?

ID: 10271359916

Submitted Through: Survey Monkey

Date: 10/10/2018 6:19:02 PM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

I think we need more. Especially at every bus stop.

What value do you think this technology brings to our city?

Hopefully catching criminals

What worries you about how this is used?

Nothing

What recommendations would you give policy makers at the City about this technology?

More cameras.

Can you imagine another way to solve the problem this technology solves?

No

Do you have any other comments?

ID: 10270768915

DRAFT

Submitted Through: Survey Monkey

Date: 10/10/2018 1:10:42 PM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

No

What value do you think this technology brings to our city?

I think it has great value in areas of high use, especially in areas where crime is historically reported. Both deterrent to crime and tool that helps law enforcement in the event crime has occurred.

What worries you about how this is used?

totally ok with it, as long as it's targeted in areas of heavy use, congested areas, high volume of people, areas with historically issues with crime, etc.

What recommendations would you give policy makers at the City about this technology?

Make sure law enforcement has real time access. Limit access to law enforcement type groups, don't get sidetracked as to possible other uses of the data.

Can you imagine another way to solve the problem this technology solves?

more police officers

Do you have any other comments?

Believe this is a cost effective way to help keep people safe.

ID: 10270556248

Submitted Through: Survey Monkey

Date: 10/10/2018 11:50:08 AM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

DRAFT

Do you have concerns about this specific technology or how it is used?

I do not want increased surveillance. License Plate Readers,

What value do you think this technology brings to our city?

None.

What worries you about how this is used?

Privacy and tracking concerns are rampant in an age where social media [LinkedIn] is almost required for a profession, a cell phone is required for jobs, and cars are required for jobs. StingRay [cell phone interceptor] has already been shown to be used unlawfully. I can only imagine a database version would be subject to equal lack of scrutiny.

What recommendations would you give policy makers at the City about this technology?

Vote no.

Can you imagine another way to solve the problem this technology solves?

Mountains out of molehills. Patrol HOV lanes.

Do you have any other comments?

Enforce HOV restrictions.

ID: 10270098107

Submitted Through: Survey Monkey

Date: 10/10/2018 9:10:36 AM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

ALPR/LPR: how is this technology used; if the data is being passively collected - how can the general public audit the back-end systems for sake of privacy (in the age of data breaches, this is a risk of *when* there is a breach and not *if*)

What value do you think this technology brings to our city?

DRAFT

Studies have shown that increased surveillance does not actually lead to reduced crime. More studies have also shown that community watch organisations do more to reduce crime than passive/active remote surveillance.

What worries you about how this is used?

Unclear duration of data usage, sharing and retention, and public request process to remove targeted data.

What recommendations would you give policy makers at the City about this technology?

Carefully evaluate vendors and their products to make sure the systems are hardened against breaches; evaluate whether the systems allow for public access to the data so that people can limit invasive surveillance.

Can you imagine another way to solve the problem this technology solves?

Better community education and watch programs. Try to find root causes of crimes and solve those causes. Surveillance is a short term gain with long term consequences and it doesn't address the problem of why crimes happen. Getting to the root cause may prove to be more productive (and in some cases, cost less public money)

Do you have any other comments?

ID: 10269149042

Submitted Through: Survey Monkey

Date: 10/10/2018 1:58:48 AM

Which surveillance technology that is currently open for public comment, do you wish to comment on?

General Surveillance comment

Do you have concerns about this specific technology or how it is used?

With all of these technologies, my main concern is unnecessary storage and retention. For example, what if you're storing some kind of information on people's cars, which then is acquired by ICE to prosecute undocumented individuals in spite of our city's sanctuary status?

What value do you think this technology brings to our city?

I believe there is value in the diagnostic capabilities, for example finding out what kind of traffic levels there are on a street or sidewalk, finding out how many bus lane cheaters there are, or maybe finding a pattern of frequent dangerous behavior on a street. In the same vein, I'm extremely supportive of having cameras on buses that bus operators can use to report bus lane violations because I think the

DRAFT

level of bus lane violations we have is a serious impediment to our transportation system. I also appreciate that tech like this removes any prejudices that a police officer may have. Either you broke the law, or you didn't. I love that this tech will be used in parking enforcement. We need to enforce our traffic laws or nobody will care.

What worries you about how this is used?

Though it removes prejudice on the part of officers, I do also think this may be sub-optimal in some circumstances. Perhaps someone as speeding by only 1 mile per hour, which reasonably, we should let slide, but with cameras, we probably won't.

What recommendations would you give policy makers at the City about this technology?

Bus and bike lane camera enforcement, yes! You have no idea how many times some bus lane violators slow down a 60-person bus, or someone blocks the bike lane forcing me to make an unsafe movement. I'd also love to see box blocking or crosswalk blocking detection technology to prevent those things from happening because it seriously reduces the livability and safety of pedestrians and transit users. Don't have any facial recognition software though.

Can you imagine another way to solve the problem this technology solves?

I don't know how actionable this is, but maybe we could work with the judicial system to give the law a little bit of discretion on the prosecution of crimes, so for example if you're speeding by 1 mph, you don't get the same fine as someone speeding by 10 mph or 30 mph.

Do you have any other comments?

Please implement bus/bike lane enforcement cameras yesterday. I get there are challenges WRT privacy and whatnot, but if we're sensitive to these issues, we can make our city safer.

DRAFT

APPENDIX F: LETTERS FROM ORGANIZATIONS

Shankar Narayan
TECHNOLOGY AND LIBERTY PROJECT DIRECTOR

AMERICAN CIVIL LIBERTIES UNION OF WASHINGTON
901 5TH AVENUE, STE 630
SEATTLE, WA 98164
T/206.624.2184
WWW.ACLU-WA.ORG

JEAN ROBINSON
BOARD PRESIDENT

KATHLEEN TAYLOR
EXECUTIVE DIRECTOR

October 24th, 2018

RE: ACLU-WA Comments Regarding Group 1 Surveillance Technologies

Dear Seattle IT:

On behalf of the ACLU of Washington, I write to offer the ACLU-WA's comments on the surveillance technologies included in Group 1 of the Seattle Surveillance Ordinance process. We are submitting these comments by mail because they do not conform to the specific format of the online comment form provided on the CTO's website, and because the technologies form groups in which some comments apply to multiple technologies.

These comments should be considered preliminary, given that the Surveillance Impact Reports for each technology leave a number of significant questions unanswered. Specific unanswered questions for each technology are noted in the comments relating to that technology, and it is our hope that those questions will be answered in the updated SIR provided to the City Council prior to its review of that technology.

The technologies in Group 1 are covered in the following order:

I. Automated License Plate Recognition (ALPR) Group

1. Automated License Plate Recognition (ALPR)(Patrol)(SPD)
2. Parking Enforcement Systems (Including ALPR)(SPD)
3. License Plate Readers (SDOT)

II. Camera Group

1. Emergency Scene Cameras (SFD)
2. Hazardous Materials (Hazmat) Camera (SFD)
3. Closed Circuit Television "Traffic Cameras" (SDOT)

I. ALPR Group

Automated License Plate Reader Systems (ALPRs) are powerful surveillance technologies that have the potential to significantly chill constitutionally protected activities by allowing the government to create a detailed picture of the movements—and therefore the lives—of a massive number of community members doing nothing more than going about their daily business. Indeed, at the first public meeting seeking comment on the SPD Patrol ALPRs, it was revealed that the ALPR system collected

1

37,000 license plates in a 24 hour period—which equates to over *13.5 million* scans over a full year. The overwhelming majority of these drivers are not suspected of any crime.

With this massive database of information, agencies can comprehensively track and plot the movements of individual cars over time, even when the driver has not broken any law. This enables agencies, including law enforcement, to undertake widespread, systematic surveillance on a level that was never possible before. Aggregate data stored for long periods of time becomes more invasive and revealing. Existing law in Seattle places no specific limits on the use of ALPR technology or data, meaning an agency can choose whether and how they want to retain data and track vehicle movements.

ALPR technology can be used to target drivers who visit sensitive places such as centers of religious worship, protests, union halls, immigration clinics, or health centers. Whole communities can be targeted based on their religious, ethnic, or associational makeup, and indeed, exactly that has happened elsewhere. In New York City, police officers drove unmarked vehicles equipped with license plate readers around local mosques in order to record each attendee as part of a massive program of suspicionless surveillance of the Muslim community. In the U.K., law enforcement agents installed over 200 cameras and license plate readers to target a predominantly Muslim community suburbs of Birmingham. ALPR data obtained from the Oakland Police Department showed that police there disproportionately deployed ALPR-mounted vehicles in low-income communities and communities of color. And the federal Immigration and Customs Enforcement agency has sought access to ALPR data in order to target immigrants for deportation. All of these concerns are magnified in light of a long history of the use of invasive surveillance technologies to target vulnerable communities (see, for example, Simone Browne's excellent, multidisciplinary book on the subject, *Dark Matters: On the Surveillance of Blackness*).

The foregoing concerns suggest the Council should ensure strong protections against the misuse of this technology, regardless of which agency is deploying it and for what purpose. Specific comments follow.

1. Automated License Plate Recognition (ALPR)(Patrol)(SPD)

The SIR relating to Patrol ALPRs raises a number of specific concerns around current policy and practice, and leaves open a number of significant questions. I attempt to capture these in sections below on concerns, questions, and recommendations.

a. Major Concerns

- *Inadequate Policies.* Policies cited in the SIR are vague, contradictory, and appear to impose no meaningful restrictions on the purposes for which ALPR data may be collected or used. Policy 16.170—the only apparent policy specific to ALPRs—for example, is very short, contains undefined terms, and focuses on training rather than use. Subsection 3 of the policy says that "ALPR Operation Shall be for Official Department Purposes" and that ALPR may be used "during routine patrol or any criminal investigation." This does not meaningfully restrict

the purposes for which ALPR may be used. And another part of the policy states that ALPR data may be accessed only when it relates to a specific criminal investigation—yet it is unclear how this relates to the enforcement of civil violations mentioned in both SPD SIRs. More generally, much of the practice described in the SIR does not appear to be reflected in any written policy at all (for example, the practice of manually verifying a hit visually is not reflected in policy).

- *Dragnet Use with No Justification.* While the SIR contains contradictory information on this point, it appears that ALPR cameras are always running, offering a vast dragnet of data collection. No legal standard is stated to justify this general, dragnet use. The Seattle Intelligence Ordinance is cited, but SPD seems to assume that dragnet surveillance is consistent with this Ordinance, without any specific policy (for example, are ALPR-equipped vehicles kept away from protests?).

- *Lengthy Retention Window with No Justification.* SPD retains ALPR data for 90 days, but examples given in the SIR of crimes solved using ALPRs largely appear to involve immediate matches against a hotlist. It is unclear what justifies this long retention window.

- *Data Sharing is Not Explicitly Limited by Policy or Statute.* The sharing of ALPR data with other agencies is of great concern, and SPD states a variety of situations in which such data may be shared (see SIR Section 6.1). But the policies cited do not make clear the criteria for such sharing, nor any inter-agency agreement that governs such sharing, nor why the data must be shared in the first place (see perfunctory answer to SIR Section 6.2). This issue of data sharing was raised in the enactment of the Surveillance Ordinance itself, and has only become more urgent under the current federal administration.

- *Inadequate Auditing.* The SIR appears to contradict itself on the subject of whether and how audits of inquiries to the system can be conducted (see SIR Sections 4.10 and 8.2, for example). As with any invasive surveillance system, a clear and regular audit trail to protect against abuse is important.

b. *Outstanding Questions*

I'm listing questions here that I hope will be answered in an updated SIR:

- To what degree are patrol and parking enforcement ALPR systems are separated, and do SPD policies on ALPR apply fully to the Parking Enforcement Systems? It appears the systems are merged at least to some extent, and in that case, the same strong protections against abuse should be applied to all systems.

- ALPR policy says there has to be a specific criminal investigation in order for ALPR data to be accessed. Does reasonable suspicion of a crime equate to a

specific criminal investigation? How is a specific criminal investigation documented?

- Under what agreements is data shared with outside agencies, and where "required by law," what specific laws require this sharing? To which systems outside SPD is data uploaded?

- How many plate images collected by the system every day? What is the hit rate on those images? Is there systematic data reflecting how many crimes each year are actually solved using ALPR data?

- How often do misreads occur? Are they systematically tracked?

c. *Recommendations*

These recommendations should be considered preliminary, pending answers to the questions above. But we urge the Council to ensure binding enforceable protections in ordinance that ensure the following minimum protections:

- Dragnet use and long retention of ALPR data should be outlawed. SPD must have reasonable suspicion that a crime has occurred before examining collected license plate reader data; they must not examine license plate reader data in order to generate reasonable suspicion. SPD should retain no information at all when a passing vehicle does not match a hot list (particularly given that such data is subject to public disclosure, including to federal agencies).

- People should be able to find out if plate data of vehicles registered to them are contained in SPD's ALPR database. They should also be able to access the data.

- There must be access controls on the ALPR databases, with only agents who have been trained in the policies governing such databases permitted access, and with every instance of access logged.

- SPD should not share any ALPR data with third parties without a written agreement ensuring that those third parties conform to the above retention and access rules, and should disclose to whom and under what circumstances the data are disclosed.

- Whenever a hit occurs, an officer, before taking any action, must confirm visually that a plate matches the number and state identified in the alert, confirm that the alert is still active by calling dispatch and, if the alert pertains to the registrant of the car and not the car itself, for example in a warrant situation, develop a reasonable belief that the vehicle's occupant(s) match any individual(s) identified in the alert.

- ALPRs should not be used for non-criminal enforcement purposes, other than parking enforcement.

- SPD should produce detailed records of ALPR scans, hits, and crimes solved specifically attributable to those hits, as well as an accounting of how ALPR use varies by neighborhood and demographic.

2. Parking Enforcement Systems (Including ALPR)(SPD)

Particularly given the partly merged nature of the parking enforcement and patrol ALPRs, including use of the parking enforcement ALPRs to check vehicle plates against hot lists, the concerns stated above with respect to SPD Patrol ALPRs apply equally to parking enforcement systems, and Council should ensure that the same minimum rules apply to them via ordinance—the intended primary use for parking enforcement does not in itself mitigate the concerns raised. In addition, the following outstanding questions should be answered in an updated SIR:

- It is unclear from the SIR how the Parking Enforcement ALPR systems integrate with the Patrol ALPR systems—it appears that some integration occurs at least in the case of the Scofflaw enforcement vans, that store collected data in the BOSS system. An updated ALPR should clarify specifically what rules apply to that data, and how they differ from rules applied to data collected by Patrol ALPR.

- A number of software and hardware providers are mentioned in Section 2.3 of the SIR—an updated SIR should clarify whether all contract directly with SPD itself, or with each other or a third party entity, to provide ALPR and related services.

- As with Patrol ALPR, statistics on numbers of scans, hits, and revenue from the systems would be helpful.

- Section 4.1 suggests pictures of the vehicle are being taken in addition to the plate—are these pictures stored, and if so, for how long?

- Concerns set forth in the section above relating to patrol ALPR regarding data access, clear standards for data sharing with third party entities and the purpose of such sharing, as well as auditing, all apply to these systems as well—and an updated SIR should clarify those standards.

3. License Plate Readers (SDOT)

The concerns stated above with respect to patrol ALPR largely apply to this set of ALPRs as well, with the additional concern of explicit sharing with a state entity. It is heartening that the SIR suggests that no license plate data is retained, but it is not clear whether that no-retention practice is reflected in policy. It is also unclear whether an explicit agreement exists with WSDOT ensuring deletion of the data and use only for the

purpose of calculating travel times. With that in mind, the following outstanding questions should be answered in an updated SIR:

- What explicit, written policies govern what SDOT and WSDOT can do with this ALPR data? Is there a written agreement with WSDOT requiring no personal data collection and deletion of all data?

- Under what circumstances might this data be used for law enforcement purposes? Is it possible for third parties to subpoena any data retained?

- What additional third parties get access to the data?

The Council should ensure by ordinance that the data collected is used only for the purpose of calculating travel times, that no data is retained, that no third party other than SDOT and WSDOT access the data at any time, and that a written agreement holds WSDOT to these restrictions.

II. Camera Group

Overall, concerns around this group of technologies largely focus on the use of these systems and the data collected by them for purposes other than those intended, over-collection and over-retention of data, and sharing of that data with third parties (such as federal law enforcement agencies). While the stated purposes of the cameras may be relatively innocuous, it is important to remember that images taken by such cameras, for example at emergency scenes, can compromise the privacy of individuals at vulnerable moments, and can be misused for the same kinds of targeting and profiling of particular communities detailed in Section I above. In addition, with the widespread and cheap availability of facial recognition technology, which can be applied after the fact to any image showing a face, it is all the more important that protections limiting the use of these tools to their intended purpose be enacted.

For all of these systems, the Council should adopt, via ordinance, clear and enforceable rules that ensure, at a minimum, the following:

- The purpose of camera use should be clearly defined, and its operation and data collected should be explicitly restricted to that purpose only.

- Data retention should be limited to the time needed to effectuate the purpose defined.

- Data sharing with third parties should be limited to those held to the same restrictions.

- Clear policies should govern operation, and all operators of the cameras should be trained in those policies.

Specific comments follow:

1. **Emergency Scene Cameras (ESCs)(SFD)**

The SIR for this technology states that no explicit internal policy exists at SFD that governs the use of ESCs, so a good start would be to create such a policy and include it in an updated SIR. This process should begin with an explicit list of specific uses for the ESCs, which are currently only set forth in general terms, and with apparent contradictions between sections of the SIR (for example, Section 1.0 describes three uses for the cameras, but Section 2.1 adds several more). In addition, the updated SIR should set forth any other internal internal policies and Washington laws governing use, retention, and disclosure of the data; where the data is stored; and which third parties, if any, have access to it, and for what purpose. (The SIR indicates data sharing with SPD, but the purpose is not clear.)

In turn, the Council should ensure via ordinance that no use is made of the images beyond the specific emergency, investigative, or training uses set forth, and that the data is deleted immediately upon completion of those purposes. Data sharing with third parties should be prohibited unless for those specific uses, and those third parties should be held to the same use and retention standards.

2. **Hazardous Materials (Hazmat) Cameras (SFD)**

As with ESCs, the SIR for Hazmat cameras indicates that no policy governing the use of this technology currently exists, with one limited exception for mechanism-of-injury recordings (see SIR Section 3.3). So similarly to ESCs, with this technology, an explicit policy that lists specific uses for the cameras should be created and included in an updated SIR. In addition, answers to questions such as who stores the data and which third parties have access to it should be made explicit. In particular, the SIR describes data sharing with law enforcement, but purposes of that disclosure are not made explicit (see SIR Section 4.7). In instances where a legal standard such as reasonable suspicion is applied, it should be clear what the standard is, who applies it, and how that application is documented. Overall, use of this technology should be limited to emergency response purposes, and any law enforcement use of the data should be restricted by ordinance.

3. **Closed Circuit Television "Traffic Cameras" (SDOT)**

As with the other two camera technologies, the crux of concern around these traffic cameras relates to limiting their use to specific purposes, enshrining in statute protections against invasion of privacy and general data collection, and limiting data sharing. It would be helpful to see the SDOT camera control guidelines referenced in the SIR, as well as to make clear in a policy applicable specifically to these cameras, what data will be deleted when (Section 5 appears to contain several different retention policies). Additional questions that an updated SIR should answer are as follows:

- The current SIR does not reference specific camera vendors and models—these would be helpful to have.

- Are there currently explicit guidelines on when recording occurs, and what's maintained? (See SIR Section 3.3 referencing recording for "compelling traffic operational needs"—the term is undefined.)

- Law enforcement use appears to be explicitly contemplated by the SIR, but the specific allowable uses are not defined—these should be made clear.

As with the other camera technologies, the Council should ensure clear purposes are defined in statute for these traffic cameras, that no use is made of the images for other purposes, that data is immediately deleted when the purpose is achieved, and that data sharing with third parties should be prohibited unless for those specific uses.

Thank you for your consideration, and we look forward to working with you on the process of ordinance implementation. Please feel free to contact me with questions or concerns.

Sincerely,

Shankar Narayan

cc: Seattle City Council and Executive

CASA LATINA
With Dignity and Opportunity
317 17TH AVENUE SOUTH, SEATTLE, WA 98144
TEL. 206.956.0779 FAX. 206.956.0780

October 29, 2018

My name is Marcos Martinez and I am the Executive Director at Casa Latina, a nonprofit organization based in Seattle that serves low income Latinx immigrant community through employment, education and community organizing.

The community that we serve at Casa Latina is particularly vulnerable to abuses by government agencies. Since the elections of 2016, our communities have been on edge due to the increased enforcement activities of agencies like ICE and Customs and Border Protection (CBP).

In addition, while government officials have pledged that the private information of individuals would be protected within agencies such as the State Department of Licensing, we have seen that those promises are not always borne out in reality. Breaches of community trust are very difficult to repair.

It is for these reasons that technologies such as the Automated License Plate Reader System cause concerns for our communities. The ACLU, in its comments on these technologies, has pointed out some major concerns regarding the policies that govern the use of the ALPR, including the lack of meaningful restrictions on the purposes for which ALPR data may be collected or used.

Limitations on data sharing are of particular concern, since this could affect immigrant community members who are subject to detention by immigration authorities but who are not the subject of any active criminal investigation by SPD. It's not clear that strong policies are in place to prohibit the sharing of data with ICE or CBP which would serve to aid those agencies in their efforts to detain immigrant community members.

Thank you for your consideration and I look forward to working with you to develop policies that protect the privacy of our most vulnerable communities.

Sincerely,

Marcos Martinez

www.casa-latina.org

DENSHŌ
The Japanese American Legacy Project

November 5, 2018

Dear Seattle IT:

I am writing to offer Densho's comments on the recently released Group 1 Surveillance Impact Reports (SIRs) under the Seattle Surveillance Ordinance review process. Densho is a community-based 501(c)(3) organization. For more than twenty years, we have been documenting the World War II incarceration of Japanese Americans to promote equity and social justice both in Seattle and across the country. The experiences of Japanese Americans are a somber lesson about the fragility of civil society in the face of intolerance and fear.

We have reason to cast a critical eye on infrastructure and systems created to monitor our citizenry. Some two decades before the beginning of WWII, the Japanese American community was targeted for mass surveillance in a coordinated effort involving the Federal Bureau of Investigation (FBI), the Office of Naval Intelligence (ONI), and the War Department's Military Intelligence Division, assisted by local law enforcement agencies. In the immediate aftermath of Pearl Harbor, US Census data was improperly used to develop exclusion area maps and lists of Japanese American citizens for registration. In the current political environment, we remember this history and are concerned about how a new breed of technologies may affect the rights of our friends and neighbors who belong to ethnic, religious and other vulnerable minority communities

These comments will cover the SIRs for the six Group 1 technologies in two primary sections. The first will address the Automated License Plate Reader (ALPR) sub-group, including SPD Patrol, Parking Enforcement, and SDOT. The second offers comments on the camera technology SIRs for SFD Emergency Scene Cameras, SFD Hazmat Cameras, SDOT Closed Circuit "Traffic Cameras"

Section 1: Automated License Plate Reader technologies

A. *General Concerns*

ALPR is a powerful technology that creates almost unprecedented abilities to surveil and track the movement of individuals across our city and region. It is already being utilized in ways that impact religious, ethnic and other minority communities. In the wake of the September 11 attacks, ALPR was used to monitor Muslim communities in New York, and more recently, US Immigration and Customs Enforcement has employed ALPR data through large aggregators such as Vigilant Solutions to target Latinx populations.

While ALPR is valuable to SPD (and SDOT) in their work, and – as discussed in the SIRs – there are generally benign and beneficial uses, the creation of a large pool of highly sensitive data presents a risk for misuse.

B. *SPD Patrol*

1416 South Jackson St. Seattle, WA 98144 Phone: 206 320.0095 Fax: 206 320.0098 www.densho.org

1. Retention policy inconsistent with stated goals
   In the SIR, the primary goal of the ALPR program is stated as, "Property Recovery" – locating stolen vehicles, while the report cites, use, "[o]n occasion," of the stored data to assist criminal investigations, in particular, the location of Amber and Silver Alert subjects. If this is the case, this casts significant doubt on the need for a lengthy data retention period. The agency does not provide the analysis that led to the decision for the 90-day period anywhere in the SIR or, in response to questions during the public engagement meeting on October 30, 2018. This policy should be driven by careful consideration of the needs of the program, rather than

2. Third-party data sharing
   As stated in the SIR, data is shared with third-parties, including law enforcement and researchers, under a number of policies and inter-agency agreements. However, the criteria for permissible sharing is vague; these policies should be articulated in a clear, consistent and explicit fashion.
3. Lack of transparency and reporting
   Statistical data regarding the collection and use of the ALPR data should be made publicly available. The implementation of SPD's new RMS should include functionality for tracking and recording when ALPR data has been used in investigations and enforcement.
4. Governing policies
   Currently, the management and use of ALPR systems is guided principally by SPD Policy 16.170. SPD officials themselves admit that Policy 16.170 is inadequate and incomplete. ALPR is a novel, powerful technology that requires

C. *Parking Enforcement (SPD)*
   1. Co-mingling of Parking Enforcement and Patrol data
      The SIR describes the flow of data from the Scofflaw "boot vans" to the centralized Neology BOSS system, shared with Patrol. It is not clear whether this data is aggregated directly with the Patrol dataset. If so, this should be more explicitly stated, and the same policies and rules should apply.

D. *SDOT*
   1. Sharing of data with WSDOT and other third parties
      The SIR does not outline whether the data-sharing agreement with WSDOT includes provisions governing the sharing and use of SDOT-collected data.

Section 2: Camera technologies

The use of image and video technologies has obvious benefits in the efficiency and delivery of emergency services in crisis situations, as was articulated in the each of the SIRs covering this group. Densho's primary concern is the possibility that the infrastructure and the data collected may be subject to uses beyond the scope of the stated purposes. While it is highly unlikely that

1416 South Jackson St. Seattle, WA 98144 Phone: 206 320.0095 Fax: 206 320.0098 www.densho.org

DENSHŌ
The Japanese American Legacy Project

SFD and SDOT would utilize the systems in ways that directly impact privacy, unless the collection, retention and sharing of data is carefully regulated, there is potential for real harm to civil liberties in the hands of third parties. Coupled with facial recognition technology, camera data can be used in ways that SFD and SDOT may not have anticipated.

We appreciate the opportunity to share these concerns with you, and hope that this process may help to make our city a welcoming, safe and truly civil society.

Sincerely,

Geoff Froh
Deputy Director

1416 South Jackson St. Seattle, WA 98144 Phone: 206 320.0095 Fax: 206 320.0098 www.densho.org

APPENDIX G: EMAILS & LETTERS FROM THE PUBLIC

Letter submitted by individual constituent:

Surveillance.
I don't want it.
Any of it.
Just stop.

Letter submitted by individual constituent:

Kevin Orme
502 N 80th
Seattle, WA 98103
206-789-3891

November 4, 2018

Public Input Commentary – Seattle Surveillance Technology open Public Comment period – 10/22 through 11/5, 2018.

Opening Remarks:

1. Surveillance technology usage in the United States of America, regardless of use, purpose and policy, is completely and wholly within the basic tenets of the Bill of Rights, otherwise known as Amendments 1-10 to the US Constitution. There are no more fundamental laws in the United States than the Constitution and the amendments thereto.

As regards privacy, public surveillance/data capture technology and police oversight – these governing principles have to be considered in any and all policies and local procedures/laws created for our democratic society. Doing anything less is simply illegal and against our whole theory of government – it's that simple.

Specifically:

The First Amendment, including rights to freedom of speech, public assembly and the press.

The Fourth Amendment, including rights preventing unreasonable search, seizure and requiring warrants for same.

The Fifth Amendment, including rights against self-incrimination and deprivation of life, liberty and property without due process.

The Sixth Amendment, including the right to confront the accuser by the accused; defense counsel when accused of a crime and proper/complete informing of the accused concerning the nature and extent of criminal accusation if occurs.

And beyond the Bill of Rights, **the 14th Amendment, Section 1**, regarding rights of due process and federal laws also applying equally to the states (which means *cities* in those same states, of course)

2. The WA State Constitution:

In addition to the Bill of Rights and the US Constitution, the WA State Constitution is also instructive:

Article 1, Section 1 – all political power is inherent in the people, and governments …..are established to protect and maintain individual rights;

Article 1, Section 2 – the US Constitution is the supreme law of the land;

Article 1, Section 7 - Invasion of Private Affairs or Home Prohibited

Article 1, Section 32- "A frequent recurrence to fundamental principles is essential to the security of individual right and the perpetuity of free government."

3. Context for Seattle: The above means essentially:

You cannot simply 'surveil everything' in the hopes of finding a criminal (or even worse, someone you simply "don't agree with"). That is called 'guilty until proven innocent' and has been overturned time and time again in our system of laws by courts and legislators at every level. The Bill of Rights has protected the 4th Amendment concept of 'Innocent until Proven Guilty' and 24-7 surveillance of **any** sort flies in the face and openly defies this most basic law.

You cannot 'surveil' public assemblies, protests, or similar gatherings, most especially with facial recognition, phone network/bluetooth data capture or public video recordings and/or microphones without again, violating the above basic constitutional principles – otherwise known as "laws" (US and WA).

You cannot store data simply according to 'policy', or come up with what you believe adequate controls may or may not be, and then implement them without complete transparency and public input, including that of the City Attorney's office, elected officials and arguably most important, THE PUBLIC. I believe this effort you have begun to solicit feedback is a good start, but there's a long way to go and this is only the very beginning, rest assured.

Finally, you cannot pay lip service to these previous paragraphs by not actively doing them yourself, and then simply turn around and receive/use/retain the data anyway through other means – that is, you cannot obtain the data from the NSA's Fusion Center already located in downtown Seattle, or the FBI, or TSA, DHS, or increasingly rogue agencies like ICE – all of these still break the law, plain and simple.

Specific technologies being discussed in this public outreach:

1) SDOT LPR's.

Positive – the data is stated as being deleted immediately after a transit time calculation;
Positive – the data is stated as only being available to SDOT personnel after relay from WSDOT, with individual identifying license plates not part of that incoming data;
Positive – stated purpose – facilitate effective and efficient traffic management within the Seattle city limits.

SDOT LPR's - COMMENT for Submission/consideration:

a) It is unclear how long WSDOT is retaining this data for handoff to SDOT and Seattle generally – even if SDOT deletes it nearly immediately after a calculation/use, can they go back and re-retrieve it later? The answer should be NO, and simply that WSDOT is doing the same thing at minimum – deleting the data almost immediately after said calculation too (I recognize this latter is beyond SDOT's control, however, certainly as the biggest city in the state, Seattle would have major influence on these policies and procedures were you to weigh in and state clear policy positions).

b) It is also unclear what the statement 'travel time calculation' precisely means for these purposes. Is it just me driving through downtown and getting spotted if I go by any of these cameras/devices? Assuming the answer is yes, when is the 'timeout' – 1 minute if not seen by another camera? 5 minutes? When and how quickly does the 'calculation' occur (so that I know purportedly the data is then "immediately deleted" as you say?

c) It is also unclear if anyone else working for the City of Seattle has access to this WSDOT data (and if so, for how long, in what capacity, at what level of detail, etc.) – say, the SPD, City Attorney's office, or? So maybe SDOT isn't "surveilling" anyone within the normal meaning of the term given the safeguards noted in the policy PDF, but certainly the SPD have far different reasons for using this data, and most (if not all) of them are far removed from simple data calculations, and include direct data review to carry out those tasks?

Traffic Cameras (SDOT)

Positive – similar purposes to those above – namely efficient and effective traffic mgmt in real time, using systems and human operators (either in a data center or on the scene, e.g. tow truck, etc.) to make it happen.

SDOT Traffic Cams - COMMENT for Submission/consideration:

a) What are the 'SDOT Camera Control Protocol Guidelines' and are they public? If not, can they be and where can we review them? Have they ever been amended due to public input, potential past problems or abuses? When were they written and by whom with what expertise?
b) What are the 'specific cases' where footage is archived and for how long?
c) Has this data ever been subpoena'd by City personnel, or outside entities (e.g. ICE, NSA or similar)?
d) The 'protections' paragraph says archived footage isn't shared with any other City dept – but what about data that is 'in transit' between realtime capture and potential archiving later (whether only for 10 days or not)? How/when and in what circumstances might footage be temporarily retained or shared outside normal policy, and potentially 'evade' the otherwise typical 10-day delete policy as a result?

SPD – ALPR's

Positive – as stated by SPD with any such whiz-bang tech – 'preventing crime'

SPD ALPR's: COMMENT for Submission/consideration:

a) Why 90 days? Why not something much more reasonable, like 15? Certainlyif the tech is sophisticated enough to create a 'hot list' as described here, **15 days – two working weeks in other words – is surely more than enough time for the data's intended purpose.**

b) Can we see examples of these 'auditable records' supposedly created by SPD when logging into ALPR/contacting dispatch? If you are making them 'auditable' for the purposes of ensuring restricted and limited use of the technology generally, then surely you don't mind if we see how that works at minimum so WE can know this (and believe you) too?

DRAFT

c) When does something become an 'active investigation' – and how long is the data retained, where stored and accessible by who then? What if the investigation is called off or invalidated by a court or city officer/city attorney – is the data immediately deleted, and an 'auditable record' of that activity created to prove it?

d) You say nothing about sharing the data with other entities (e.g. ICE, DHS, etc.) - do you? Are you planning to? Have you done so in the past? If so on any of these, under what circumstances and did they provide any sort of a warrant of any kind?

e) You stated there are eight SPD cars equipped with ALPR systems now, and that statement implies that this is the 'only' such ALPR system deployed 1) for these purposes, 2) with this specific technology citywide. Is this true? Are there stationary systems mounted elsewhere in the city that are networked (now or can be in the future) and if so, how many are there? Are there plans (either already in motion or for say, the next few years) to implement either more cars, add in stationary systems, or both? Certainly at minimum, just like with red light cameras, we deserve and demand publicly posted notice of any such stationary systems if they exist or are being deployed.

f) I have read the online 16.170-POL governing ALPR use http://www.seattle.gov/police-manual/title-16---patrol-operations/16170--automatic-license-plate-readers – and it's pretty sparse with only 4 short bullet points.
– more questions:

f1) what is ACCESS certification and how can we know more that it does what it's intended to do? Where is the training, who does it, is it a private entity creating coursework, etc.?

f2) how often are these standards updated (e.g. the policy is already 6 years old, dating from 2012 – certainly the technology is not falling behind in the same way);

f3) Who is in charge of TESU and what are their qualifications? Are they elected officials or behind the scenes?

f4) does the terminology 'part of an active investigation' = 'we got a hit on a license plate of X' – and X is a known criminal, there's a warrant out, or? Need way more information here, this is far too vague and un-specific when regards data management and control. I could be the most qualified TESU guy in the department and yet it doesn't mean I should be entitled to look at *any* data – especially without a legal warrant to do so? Where are the other controlling provisions?

Emergency Scene Cameras

Positive – improve and continue to enhance emergency preparedness and response effectiveness.

Emergency Cams: COMMENT for Submission/consideration:

a) where are the 'internal policies' and 'WA laws' governing storage of said photos and materials? The PDF is pretty vague.
b) Is live footage/drone image, sound and data capture being considered or already being used? As to data captured (audio, video, photo), storage management, retention and access policies – the Details, Please.

c) what about the same (live footage/audio/video) from vehicles or bodycams/etc.? Again, Details please.

Hazmat Cameras

Positive – largely identical to that of Emergency Incident Response, save the potential for nefarious/negligent actors to be involved

Hazmat Cams: COMMENT for Submission/consideration:

a) similar to with Emergency Cameras – essentially how long is the data stored, especially if no criminal activity is determined or the investigation concludes

b) anything beyond tablets used or planned to be used? This mentions tablets as the primary tech, but that doesn't foreclose plans for more (or by aggressive tech vendors already talking to you)?

c) what sort of data management training is provided to either HazMat or Emergency Responders, for that matter?

Parking Enforcement (SPD)

Positive – enforce parking and related laws, determine 'booting' situations ***SPD Parking Enforcement: COMMENT for Submission/consideration:***

a) there is nothing seen here about general data storage or retention parameters – Details, Please.

b) there is nothing here about whether this ALPR data is 'pooled' with ALPR datacollected from the eight so-equipped SPD cars mentioned earlier – and if so, whether governed by those parameters and restrictions too/not? Details, Please.

c) are these technologies governed by TESU as the others are? Barring possibly those controlled directly by the Seattle Municipal Court itself, separate from the SPD? Details, Please.

d) there is also no mention of the (likely older) Red Light Traffic Cam technology that has been in use in city locations for some years now, possibly over a decade. These aren't for SDOT use, these are for people running red lights, of course. All the relevant details (Data capture, retention, storage, access, certification, etc.) - all these apply here too – Details, Please.

Submitted 11/4/2018 by

Kevin Orme
502 N 80th
Seattle, WA 98103
206-789-3891

DRAFT

APPENDIX H: PUBLIC COMMENT ANALYSIS METHODOLOGY

OVERVIEW

The approach to comment analysis includes combination of qualitative and quantitative methods. A basic qualitative text analysis of the comments received, and a subsequent comparative analysis of results, were validated against quantitative results. Each comment was analyzed in the following ways, to observe trends and confirm conclusions:

1. Analyzed collectively, as a whole, with all other comments received
2. Analyzed by technology
3. Analyzed by technology and question

A summary of findings are included in Appendix B: Public Comment Demographics and Analysis. All comments received are included in Appendix E: All Individual Comments Received.

BACKGROUND ON METHODOLOGICAL FRAMEWORK

A modified Framework Methodology was used for qualitative analysis of the comments received, which "*…approaches [that] identify commonalities and differences in qualitative data, before focusing on relationships between different parts of the data, thereby seeking to draw descriptive and/or explanatory conclusions clustered around themes" (Gale, N.K., et.al, 2013).* Framework Methodology is a coding process which includes both inductive and deductive approaches to qualitative analysis.

The goal is to classify the subject data so that it can be meaningfully compared with other elements of the data and help inform decision-making. Framework Methodology is "not designed to be representative of a wider population, but purposive to capture diversity around a phenomenon" (*Gale, N.K., et.al, 2013).*

METHODOLOGY

STEP ONE: PREPARE DATA

1. Compile data received.
    a. Daily collection and maintenance of 2 primary datasets.
        i. Master dataset: a record of all raw comments received, questions generated at public meetings, and demographic information collected from all methods of submission.
        ii. Comment analysis dataset: the dataset used for comment analysis that contains coded data and the qualitative codebook. The codebook contains the qualitative codes used for analysis and their definitions.
2. Clean the compiled data.
    a. Ensure data is as consistent and complete as possible. Remove special characters for machine readability and analysis.
    b. Comments submitted through SurveyMonkey for "General Surveillance" remained in the "General Surveillance" category for the analysis, regardless of content of the

DRAFT

comment. Comments on surveillance generally, generated at public meetings, were categorized as such.

c. Filter data by technology for inclusion in individual SIRs.

STEP TWO: CONDUCT QUALITATIVE ANALYSIS USING FRAMEWORK METHODOLOGY

1. Become familiar with the structure and content of the data. This occurred daily compilation and cleaning of the data in step one.
2. Individually and collaboratively code the comments received, and identify emergent themes.
    I. Begin with deductive coding by developing pre-defined codes derived from the prescribed survey and small group facilitator questions and responses.
    II. Use clean data, as outlined in Data Cleaning section above, to inductively code comments.
        A. Each coder individually reviews the comments and independently codes them.
        B. Coders compare and discuss codes, subcodes, and broad themes that emerge.
        C. Qualitative codes are added as a new field (or series of fields) into the Comments dataset to derive greater insight into themes, and provide increased opportunity for visualizing findings.
    III. Develop the analytical framework.
        A. Coders discuss codes, sub-codes, and broad themes that emerge, until codes are agreed upon by all parties.
        B. Codes are grouped into larger categories or themes.
        C. The codes are be documented and defined in the codebook.
    IV. Apply the framework to code the remainder of the comments received.
    V. Interpret the data by identifying differences and map relationships between codes and themes, using R and Tableau.

STEP THREE: CONDUCT QUANTITATIVE ANALYSIS

1. Identify frequency of qualitative codes for each technology overall, by questions, or by themes:
    I. Analyze results for single word codes.
    II. Analyze results for word pair codes (for context).
2. Identify the most commonly used words and word pairs (most common and least common) for all comments received.
    I. Compare results with qualitative code frequencies and use to validate codes.
    II. Create network graph to identify relationships and frequencies between words used in comments submitted. Use this graph to validate analysis and themes.
3. Extract CSVs of single word codes, word pair codes, and word pairs in text of the comments, as well as the corresponding frequencies for generating visualizations in Tableau.

STEP FOUR: SUMMARIZATION

1. Visualize themes and codes in Tableau. Use call out quotes to provide context and tone.
2. Included summary information and analysis in the appendices of each SIR.

DRAFT

APPENDIX I: CTO NOTICE OF SURVEILLANCE TECHNOLOGY

Thank you for your department's efforts to comply with the new Surveillance Ordinance, including a review of your existing technologies to determine which may be subject to the Ordinance. I recognize this was a significant investment of time by your staff; their efforts are helping to build Council and public trust in how the City collects and uses data.

As required by the Ordinance (SMC 14.18.020.D), this is formal notice that the technologies listed below will require review and approval by City Council to remain in use. This list was determined through a process outlined in the Ordinance and was submitted at the end of last year for review to the Mayor's Office and City Council.

The first technology on the list below must be submitted for review by March 31, 2018, with one additional technology submitted for review at the end of each month after that. The City's Privacy Team has been tasked with assisting you and your staff with the completion of this process and has already begun working with your designated department team members to provide direction about the Surveillance Impact Report completion process.

Please let me know if you have any questions.

Thank you,

Michael Mattmiller

Chief Technology Officer

Technology	Description	Proposed Review Order
License Plate Readers	License Plate Reader (LPR) cameras are a specialized CCTV camera with built in software to help identify and record license plates on vehicles. Travel times are generated by collecting arrival times at various checkpoints and matching the vehicle license plate numbers between consecutive checkpoints. This information is collected under the authority of SMC 11.16.200 requiring SDOT to keep records of traffic volumes.	1

DRAFT

Technology	Description	Proposed Review Order
Closed Circuit Television Equipment	SDOT has cameras installed throughout the City to monitor congestion, incidents, closures, and other traffic issues. The technology provides the ability to see roads, providing engineers with the necessary information to manage an incident and identify alternate routes. Every camera is available for live viewing by the public via our Traveler Information Web Map (http://web6.seattle.gov/Travelers/). The video is not archived. This information is collected under the authority of SMC 11.16.200 requiring SDOT to keep records of traffic volumes.	2
Acyclica	Acyclica devices are in street furniture throughout the City and determine real time vehicle travel times in the City corridor by identifying WiFi-enabled devices in vehicles, such as smart phones, traveling between multiple sites. The identifying information is anonymized. Additionally, the data is deleted within 24 hours to prevent tracking devices over time. This information is collected under the authority of SMC 11.16.200, requiring SDOT to keep records of traffic volumes, as well as SMC 11.16.220 requiring an annual report on traffic.	3

DRAFT