2019

Surveillance Technology Community Equity Impact Assessment and Policy Guidance Report

Seattle Information Technology

Contents

Surveillance Technology Community Equity Impact Assessment and Policy Guidance Report ……………………………………………………………………………………… 3

Working Group Equity Impact Assessment………………………………………………7

CTO Response Memo……………………………………………………………………..….14

Surveillance Technology Community Equity Impact Assessment and Policy Guidance Report

Purpose

The purpose of the Equity Impact Assessment is to provide analysis about whether the Surveillance Ordinance is meeting its goals and to provide recommendations about changes, adjustments or new approaches to meet its stated objectives. The Ordinance language definition this required report is as follows:

> *Every year, beginning by no later than September 15, 2019, and continuing by no later than September 15 each year thereafter, the Chief Technology Officer shall produce and submit to the City Council a Surveillance Technology Community Equity Impact Assessment and Policy Guidance Report ("equity impact assessment"), to be filed with the City Clerk with an electronic copy to the Council, the Chair of the committee responsible for technology matters, the co-chairs of the Working Group, the City Auditor, the Inspector General for Public Safety, and the Director of Central Staff, and posted to the City's website.*
>
> *The equity impact assessment shall address, at a minimum, the following:*
> 1. *Whether this Chapter 14.18 is effectively meeting the goals of the Race and Social Justice Initiative, including whether any communities and groups in the City are disproportionately impacted by the use of surveillance technologies;*
> 2. *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; and*
> 3. *Any new approaches and considerations the City Council should bring to future reviews of requests for Council approval submitted pursuant to Section 14.18.030.*
>
> *B. The CTO shall consult with the co-chairs of the Working Group in the writing of the equity impact assessment, and shall include all Working Group feedback and recommendations in the equity impact assessment; if the CTO disagrees with a recommendation, the CTO shall provide an explanation of the disagreement in the report.*

Report Organization

This report provides sections devoted to:

- **Ordinance Background**
- **Report Summary**
- **RSJI Goals and Community Impact**
- **Recommended Policy and Legal Adjustments**
- **Future Review Considerations**

Background

The Surveillance Ordinance

The Seattle City Council passed Ordinance 125376, known as the "Surveillance Ordinance", to provide greater transparency to City Council and the public when the City acquires technology that meets the City's definition of surveillance. The Surveillance Ordinance, which took effect in September 2017, outlines requirements that include surveillance technology review and approval by City Council before acquisition for new technologies; Council review and approval via ordinance for existing technologies; and reporting about surveillance technology use and community impact. The Surveillance Ordinance is meant to protect the information of vulnerable populations who may not understand how information they give to the City could be used. The American Civil Liberties Union and the Seattle Privacy Coalition are active partners in this effort.

SIR Completion Status

To date, drafts of the following SIRs have been completed. Two (SDOT's CCTV and LPR) will be under Council consideration in September 2019. The rest are under final policy deliberation and will be ready for Council consideration later in 2019 and in 2020:

Department	Technology	Description
SDOT	Closed Circuit Television (CCTV)	Traffic management and situational awareness
	License Plate Readers (LPR)	Traffic management and travel time reporting
	Acyclica	Traffic management and travel time reporting
SFD	Computer Aided Dispatch (CAD)	Emergency response and resource management
	Emergency Scene Cameras	Incident documentation for response purposes
	Hazardous Materials Cameras	Distance assessment for response determination
SCL	Binoculars	All three technologies are used for unpaid electricity consumption (Current Diversion) investigations
	Check Meter Device	
	SensorLink AmpFork	
SPD	Computer Aided Dispatch (CAD)	Emergency response and resource management
	Automated License Plate Reader (ALPR)	Public safety and theft investigations
	Parking Enforcement (Including ALPR)	Parking enforcement
	CopLogic	Public police reporting system for low-level crime
	911 Logging Recorder	Access to logged recordings of 911 center calls

Report Summary

This report finds that, due to unforeseen delays, there has not been enough time to assess the effectiveness of this law in identifying and remediating equity issues associated with the technologies identified as meeting the surveillance definition. Because of the time required to draft and enact the 2018 Ordinance amendment, standing up of the Working Group, and deliberations between stakeholders about policy finalization, the first two Surveillance Impact Reports (SIRs) are scheduled for review with the GET Committee on 9/17/2019. Because of this adjusted timeline, analysis of those policies' effectiveness will be better considered in the 2020 report.

RSJI Goals and Community Impact

Whether this Chapter 14.18 is effectively meeting the goals of the Race and Social Justice Initiative, including whether any communities and groups in the City are disproportionately impacted by the use of surveillance technologies

SIR RSJI review

We included a modified RSJI review methodology for the SIR to ask and document equity concerns for the technologies under review. The purpose of this section of the SIR is:

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

Comment Analysis

While we do not yet have enough experience to assess whether the policies related to the technologies identified as surveillance are effective, the comments submitted during the public engagement periods are useful in understanding sentiment about potential disproportionate impact of technologies.

Public Engagement

Public engagement conducted for the completed SIRs included public meetings, discussion at previously scheduled departmental public meetings, focus group discussions and an invitation to provide online comments during the public comment periods for each technology review. Public engagement events were conducted across the City to introduce the public to the technologies, invite questions and discuss issues about the technologies under review. Significant effort was made to include diverse groups, including invitations to over 60 community groups and civil liberties advocating organizations.

Themes

Few specific concerns about disproportionate use or disparate community impact were raised for the 14 SIRs that have been completed. The main themes for comments provided included general concern about the concept of government unnecessarily or over-surveilling in a way that could impact individual rights and civil liberties; uneasiness regarding how data and information is shared with other government agencies or City departments; appropriate application of department and city policy enforcement to ensure proper data use and management; and the potential for data collected for one purpose being used for other purposes related to public safety and law enforcement. There were also comments requesting additional cameras to enforce bike lane regulations and park safety. For detailed comment analysis, please see individual SIRs.

Recommended Policy and Legal Adjustments

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

As discussed above, disproportionate community impacts were not identified through public engagement for the technologies reviewed. As previously noted, the first two SIRs have just been completed and transmitted to Council for approval. Adjustment to the policies and Ordinance based on performance against the Ordinance intention would be better considered in the 2020 Annual Equity Report.

Council Considerations for Future Reviews

> *Any new approaches and considerations the City Council should bring to future reviews of requests for Council approval submitted pursuant to Section 14.18.030*

Policy Collaboration

The final stage of analysis and discussion between stakeholders about the CSIR and the operational policies highlighted therein, occurs late in the process, before final SIR draft submission to Council. A review and identification of policy principles in advance would be more impactful method of informing and establishing acceptable policies about the use of the technologies under review. Moving this conversation to the beginning of the process in a discussion about acceptable use and civil liberties protecting data management policies and principles would be an effective approach to achieving Ordinance objectives.

Working Group Equity Impact Assessment

From: Seattle Community Surveillance Working Group (CSWG)
To: Seattle City Council
Date: September 6, 2019
Re: 2019 Equity Impact Assessment

This document constitutes the recommendations of the Community Surveillance Working Group (CSWG) for the 2019 Equity Impact Assessment under the Seattle Surveillance Ordinance (SSO). As mandated in SMC 14.18.050, the CTO shall consult with the co-chairs of the Working Group in the writing of the Equity Impact Assessment, and shall include all Working Group feedback and recommendations in the Equity Impact Assessment. If the CTO disagrees with a recommendation, the CTO shall provide an explanation of the disagreement in the report.

SMC 14.18.050 mandates that the Equity Impact Assessment must address at the minimum, the following:

- Whether SMC 14.18 is effectively meeting the goals of the Race and Social Justice Initiative (RSJI), including whether any communities and groups in the City are disproportionately impacted by the use of surveillance technologies;

- 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;

- Any new approaches and considerations the City Council should bring to future reviews of requests for Council approval.

Each of these three areas is addressed below. Our overall assessment is that the implementation of the SSO has made a good start toward meeting the goals of the RSJI in this context, although significant concerns remain to be addressed. We believe the ordinance remains a groundbreaking statute both in its commitment to transparency around technology and its inclusion of community-based perspectives. The good implementation work done thus far has already brought to light technologies and perspectives that might otherwise have escaped public notice. We believe continued strong implementation of the ordinance will allow Seattle to retain its status as a leader in both innovation and in protecting civil liberties.

Our feedback is informed by CSWG's extensive work since early this year of reviewing fourteen Surveillance Impact Reports (SIRs), and generating detailed Privacy and Civil Liberties Impact Assessments (PCLIAs) based on those reviews. Importantly, the PCLIAs contain specific substantive recommendations for regulation of each technology that we hope the Council will adopt in the form of clear and enforceable rules around each technology. That action will help fulfill the original intent of the ordinance—to create "procedures and protocols" to give both the public and operating agencies clarity around how that technology should and should not be used. It will also help advance the goals of the RSJI by providing critical protections for marginalized and vulnerable communities such as those many CSWG members serve and belong to. In addition, we provide recommendations around altering the timeline for review for the remaining surveillance technologies; and around strengthening community outreach.

Is SMC 14.18 effectively meeting the goals of the Race and Social Justice Initiative (RSJI)?

Background

The website of the City of Seattle sets forth the goals of the RSJI as follows:

> "RSJI builds on the work of the civil rights movement and the ongoing efforts of individuals and groups in Seattle to confront racism." Its long-term goals are "to change the underlying system that creates race-based disparities in our community and to achieve racial equity." [1]

We believe the primary underlying impetus of the SSO is to advance these goals by mitigating, reversing, safeguarding against, and/or preventing the disproportionate impact of surveillance technologies on marginalized and vulnerable communities. If effectively implemented, the SSO will result in transparent and enforceable rules, clear to both impacted communities and to the agencies using the surveillance technologies, that will help prevent long-established patterns of disproportionate impacts. The SSO will also ensure that the City Council's decisions on surveillance technologies are informed by community perspectives, and build the capacity of impacted communities to engage with the process of approving or disapproving such technologies, and creating rules around them.

As a reminder to the Council as to the alignment of the goals of the SSO with those of the RSJI, the SSO itself came about in response to unregulated acquisitions of surveillance technology by the City. Agencies ignored the ordinance even after its initial passage in 2013, so the Council strengthened the ordinance in 2017 and 2018 to require greater accountability, oversight, and community input, including creating the CSWG. During those discussions, dozens of community groups representing marginalized and vulnerable communities voiced concerns that City agencies had been acquiring increasingly powerful surveillance technologies, including facial recognition, social media monitoring systems, automated license plate readers, drones, and other powerful surveillance systems. As a result of the input of those groups, the final version of the SSO has been lauded by experts as a national model.

Community organizations invested heavily in the successful passage and implementation of the Seattle Surveillance Ordinance because it is these communities that have historically borne the brunt of surveillance, from the incarceration of Japanese-Americans during WW2, to the surveillance of Black civil rights leaders, to the warrantless targeting of the Muslim community after 9/11. Today, the trend continues—for example, ICE continues to seek access to state and local facial recognition and license plate reader systems, and local governments elsewhere are using surveillance technology to chill speech, association, and protest.

---

[1] https://www.seattle.gov/rsji/about

Race Equity Impacts

The point of including all of the foregoing information here is to emphasize that process matters—the very process of community engagement and creating transparency around surveillance technologies is itself a victory for the goals of the RSJI. The SSO has surfaced multiple technologies that were previously undisclosed to the public, some of which have far greater surveillance capabilities than technologies that have historically been targeted at vulnerable and marginalized communities, and some of which raise significant race equity concerns.

For example, our assessment of the CopLogic technology raises such concerns because it allows retailers to obtain and enter identifying information into a law enforcement database on the basis of mere suspicion of criminality, without conviction or further due process. Because consumer racial profiling by retailers is a widespread and well-documented practice, it is likely that people of color will be disproportionately apprehended and entered into SPD's database by private entities using CopLogic. Similarly, other technologies such as SPD's Automated License Plate Recognition (ALPR), can be used to chill constitutionally protected activities by targeting drivers who visit sensitive places such as centers of worship, protests, union halls, immigration clinics, or health centers. While we do not have enough information on current usage to say whether such targeting is actually happening in Seattle (and no agency is likely to include such data in an SIR), the point of the SSO is to proactively prevent these impacts by creating clear and enforceable rules around technologies.

Overall Assessment

It is our assessment that **while the implementation of the SSO has made a good start toward meeting the goals of the RSJI in this context, significant concerns remain to be addressed**. Positive steps thus far include:

- The creation of 14 SIRs to provide detailed information about existing surveillance technologies, including the surfacing of many technologies not previously disclosed to the public.

- The input of the CSWG, a group primarily comprised of representatives of communities the RSJI intends to protect, as to the privacy and civil liberties impacts of the surveillance technologies.

- Public outreach, hearings, and discussions that have engaged a broader swath of the public and impacted communities in particular in regulating surveillance technologies.

However, significant concerns remain. In order both for Seattle to further the RSJI goals and retain its status as a leader in this space, these concerns must be addressed:

- The Council has not yet turned any of the CSWG's recommendations (as set forth in the PCLIAs) for regulation into clear and enforceable policies.

- The SIRs, while often thorough and precise, also sometimes contain vague, imprecise, incomplete, or outdated information. The City should continue to work to address this.

- The timeline for implementation of the ordinance leaves inadequate time for reviewing the remaining SIRs, and in particular, cuts off time for meaningful community review.

- The process of community review itself currently does not allow broad engagement by the public in the implementation process.

We elaborate on each of these concerns in the following sections.

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?

The best way for the Council to remedy the disproportionate impacts of surveillance technologies is to adopt the substantive recommendations set forth in each PCLIA, via a clear, simple, and uniform set of enforceable policies and procedures. A proposed format has already been reviewed by the CSWG and is included as an appendix here ("EPP Format[2]"). However, other formats could also be used, provided that they are clear, directive, and enforceable. This step is critical because the SIRs, while very useful, are also lengthy (some are 400+ pages), merely summarize existing agency practices, and do not clearly delineate policies and procedures.

By contrast, the EPP provides a standardized template with directive instructions that are applicable to all the surveillance technologies under review, making clear that these instructions are not merely a reflection of existing agency practices. Importantly, the EPP explicitly states that the language in the EPP document constitutes the enforceable policies and procedures applicable to the respective technology that are enforceable via SMC 14.18.70. The CSWG recommends the adoption of such a directive document for each technology that clearly lays out the ways in which an agency can and cannot use a specific surveillance technology.

What new approaches or considerations should the City Council bring to future reviews of requests for Council approval?

In addition to the adoption of a uniform format for enforceable policies and procedures, the Council should take the following steps:

- **Ensure all SIRs presented to the Council are accurate, comprehensive, and complete.** Where outdated or incomplete information is found in an SIR, the Council should take steps to ensure that the SIR is corrected and made available in that form to the public.

- **Ensure the implementation timeline for the ordinance is revised such that meaningful CSWG review, community outreach, and public engagement is feasible.** Meaningful community engagement is critical to the successful implementation of the Ordinance, but the City's current timeline for disseminating the SIRs provides neither community members nor the CSWG adequate time to review and comment on the surveillance technologies up for review. The 29 surveillance technologies up for review have been divided into four groups. Fourteen technologies in Groups 1 and 2 have been shared for public comment and have been reviewed by the CSWG. We are waiting to see the SIRs for Group 3 and Group 4 technologies. The proposed public comment period for Group 3 is 7/3/2019 – 8/2/2019,[3] dates that have now passed. The proposed public comment period for Group 4 is 11/5/2019 – 12/3/2019, which gives the CSWG and the public less than one month to review the SIRs for 10 technologies, some of which are the most concerning technologies from a race equity perspective in all four groups. We recommend that the City: (1) re-order the transmission of the SIRs so the public has the opportunity to review the most concerning technologies first; and (2) transmit the technologies in manageable batches or one at a time (e.g., instead of taking large gaps of time between transmitting groups of technologies and providing just one month to review 10 technologies, spacing out transmission of the SIRs in a more balanced way).

- **Strengthen the process of community outreach under the SSO.** In order to ensure that the implementation of the SSO is a community-driven process, it is key that the City strengthens its community outreach efforts and makes knowledge about documents and meetings more accessible. The community organizations that constitute the CSWG, as well as the communities they are connected to, have expertise in this space to make this process community-oriented and in line with RSJI's goals—and we would appreciate greater engagement and partnership with the City as it conducts that outreach, which has thus far largely been conducted without our collaboration. It is also important that the communities that have been historically over-surveilled and disproportionately impacted by surveillance technologies have access to the information they need to actively engage in the implementation process—for example, by making CSWG's PCLIAs available on the CTO's website, and making information about meetings of the CSWG more easily accessible. CSWG is happy to work with the City to strengthen community outreach and engagement.

Conclusion

Seattle has made a good start to implementing the SSO and putting into action its intended, transformative purpose: protecting historically marginalized and vulnerable communities from the impacts of surveillance. However, much work remains to be done—starting with the critical step of turning the valuable lessons learned from the SIRs into clear, enforceable rules around technologies that can help protect those communities. In addition, the implementation timeline must be revised and the community outreach process improved in order for the SSO's implementation to live up to its transformative potential and intent. We welcome deeper collaboration with the City to reach these goals.

---

[2] See Appendix A: Enforceable Policies and Procedures Format

[3] https://www.seattle.gov/Documents/Departments/Tech/2018-09-28%20Revised%20Master%20List%20of%20Surveillance%20Technologies.pdf

Appendix A: Enforceable Policies and Procedures Format

Section [X]: Enforceable Policies and Procedures

This Section [X] constitutes the enforceable policies and procedures applicable to [Name of Surveillance Technology], as set forth in SMC 14.18, and are enforceable via SMC 14.18.070.

X.1 Designation and Description

This Section [X] applies to the [Name of Surveillance Technology] described below. Any material change to the surveillance capabilities described below requires reapproval by City Council.

> [Name of Surveillance Technology] as used in this Section consists of the following Surveillance Technology:
>
> [Description of the Surveillance Technology, including make and model, configuration, specifications, surveillance capabilities, etc.]

X.2 Use and Use Restrictions

[Name of Surveillance Technology] shall be used only for the purposes set forth below. Any proposed use of [Name of Surveillance Technology] that falls outside these purposes requires reapproval by City Council:

> [Description of allowable purposes for the technology]

In addition, the following use restrictions apply to [Name of Surveillance Technology]:

> [Description of any additional rules and restrictions around use/operation of the technology.]

X.3 Designated Internal and External Users

[Name of Surveillance Technology] shall be accessed and operated only by the following users:

> [Description of individuals and/or entities (internal or third party) that are allowed to access and use the technology, as well as any further restrictions on circumstances under which they are allowed to do so.]

X.4 Data Collection

[Name of Surveillance Technology] shall not be used to collect any data other than the following:

> [Description of what data may be collected, what data shall not be collected.]

X.5 Data Retention and Deletion

The following data retention and deletion schedule applies to all data collected by [Name of

Surveillance Technology]:

[Description of data retention and deletion time periods.]

X.6 Designated Internal and External Data Access

Data collected by [Name of Surveillance Technology] may be accessed only by the following users:

[Description of individuals and/or entities (internal or third party) that are allowed to access the data collected by the technology, as well as any further restrictions on circumstances under which they are allowed to do so. This may also include a description of the allowable form in which data may be shared.]

X.7 Data Security

The following data security protocols shall apply to data collected by [Name of Surveillance Technology]:

[Description of where and how data must be accessed, stored, and transmitted, as well as any auditing requirements.]

X.8 Training

Internal or external users of [Name of Surveillance Technology], and those accessing data collected by [Name of Surveillance Technology], must complete the following training prior to using [Name of Surveillance Technology] or accessing data collected by it:

[Description of any training requirements for users.]

X.9 Additional Provisions

The following additional provisions apply to [Name of Surveillance Technology]:

[Description of additional policies and procedures specific to a given surveillance technology that may not be captured by the categories above.]

CTO Memo

Date: 9/13/2019

To: Seattle City Council

From: Saad Bashir

Subject: CTO Response to the Surveillance Working Group Equity Impact Assessment

---

Purpose

As provided in the Surveillance Ordinance, SMC 14.18.050, this memo outlines the Chief Technology Officer's (CTO's) response to the Surveillance Working Group's assessment on the Surveillance Technology Community Equity Impact Assessment and Policy Guidance Report. Specifically:

> *B. The CTO shall consult with the co-chairs of the Working Group in the writing of the equity impact assessment, and shall include all Working Group feedback and recommendations in the equity impact assessment; if the CTO disagrees with a recommendation, the CTO shall provide an explanation of the disagreement in the report.*

Background

The purpose of the Equity Impact Assessment is to provide analysis about whether the Surveillance Ordinance is meeting its goals and to provide recommendations about changes, adjustments or new approaches to meet its stated objectives. The Ordinance language definition this required report is as follows:

> *Every year, beginning by no later than September 15, 2019, and continuing by no later than September 15 each year thereafter, the Chief Technology Officer shall produce and submit to the City Council a Surveillance Technology Community Equity Impact Assessment and Policy Guidance Report ("equity impact assessment"), to be filed with the City Clerk with an electronic copy to the Council, the Chair of the committee responsible for technology matters, the co-chairs of the Working Group, the City Auditor, the Inspector General for Public Safety, and the Director of Central Staff, and posted to the City's website.*
>
> *The equity impact assessment shall address, at a minimum, the following:*
>
> 4. *Whether this Chapter 14.18 is effectively meeting the goals of the Race and Social Justice Initiative, including whether any communities and groups in the City are disproportionately impacted by the use of surveillance technologies;*
> 5. *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; and*
> 6. *Any new approaches and considerations the City Council should bring to future reviews of requests for Council approval submitted pursuant to Section 14.18.030.*

Working Group Concerns

The Working Group Equity Impact Assessment discusses a variety of positive steps that have been made toward compliance with the Surveillance Ordinance and the goals of the RSJI and identifies areas of concern. These are in bold below, along with the CTO's response:

1. **The Council has not yet turned any of the CSWG's recommendations (as set forth in the PCLIAs) for regulation into clear and enforceable policies.**

   To date, none of the technologies on the Master List have completed the full Surveillance Impact Report (SIR) review process. This is due to significant delays in finalizing and enacting the 2018 Ordinance Amendment and recent policy deliberations about the SIR summary document and enforceable policies, requested at the 5/21 GET Committee meeting.

   The SIR and Condensed Surveillance Impact Report (CSIR) become binding documents when approved by Council, which outline the policies and procedures that will hold the departments accountable for the use of the technology as approved by Council. The Condensed Surveillance Impact Report (CSIR) format was agreed to after extensive discussion over two meetings. The participants to those discussions included ACLU, CM Mike O'Brien, CP Bruce Harrell, their staff members, Council Central Staff, the Working Group, Department Staff, the CTO, Privacy Office, and the Mayor's Office. These documents represent the clear enforceable policies required by the Ordinance and a summary document previously requested by Council.

2. **The SIRs, while often thorough and precise, also sometimes contain vague, imprecise, incomplete, or outdated information. The City should continue to work to address this.**

   SIRs are drafted and published with information available from the department and the vendors with whom they work. Every effort is made to provide clear and accurate information. However, there can be a considerable lag time between SIR drafting and finalization, during which technologies may be updated or companies may be acquired resulting in changes. We will continue to work with departments to ensure that the most accurate information is provided for all future SIRs.

3. **The timeline for implementation of the ordinance leaves inadequate time for reviewing the remaining SIRs, and in particular, cuts off time for meaningful community review.**

   Given the delays associated with the 2018 Amendment, the deliberation about the SIR summary requested by Council, and the time now required to collaborate and finalize a Condensed SIR for each technology under review, the Ordinance provision of a six-month extension to the March 2020 SIR submission deadline may be considered.

4. **The process of community review itself currently does not allow broad engagement by the public in the implementation process.**

   The Ordinance requirements for public engagement are prescriptive. The City uses those requirements as a baseline to conduct public engagement, in addition to clear direction to work with the Department of Neighborhoods. We are expanding this reach by collaborating with the CSWG to ensure we are reaching as many communities as possible.

In conclusion, I and my team remain committed to fulfilling both the letter and the intent of this Ordinance, promoting transparency and public oversight for these technologies.

Sincerely,

Saad Bashir

Chief Technology Officer

City of Seattle