2018 Surveillance Impact Report

CLOSED CIRCUIT TELEVISION "TRAFFIC CAMERAS"

SEATTLE DEPARTMENT OF TRANSPORTATION

October 8, 2018

Seattle
Information Technology

CONTENTS

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.

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.

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.

ITSStrategicPlan201
02020.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.

PDF
ITSStrategicPlan201
02020.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:
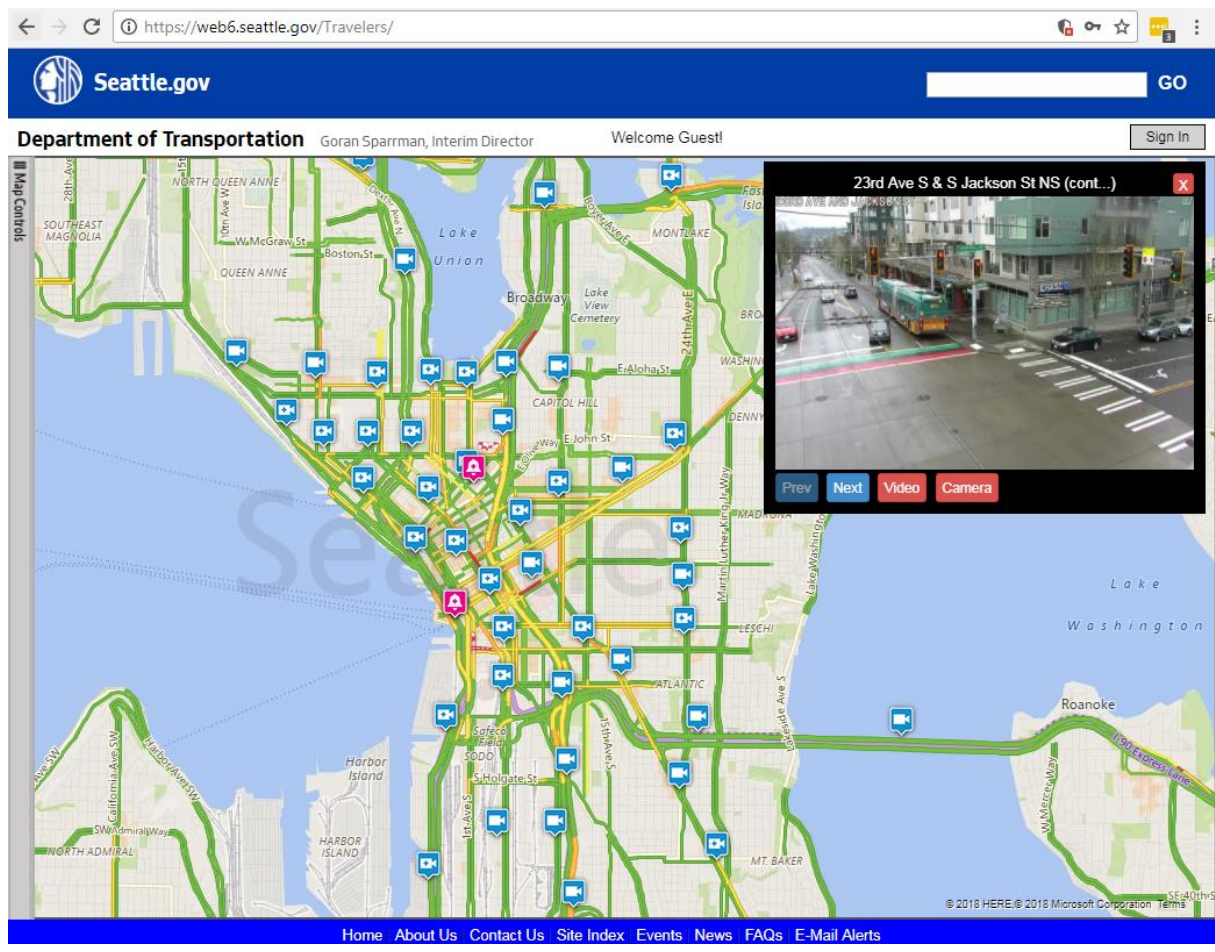
4.7 How will data that is collected be accessed and by whom?

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.

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.

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.

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.

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

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.

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

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

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

1.5 Are there impacts on:

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

> 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"):*
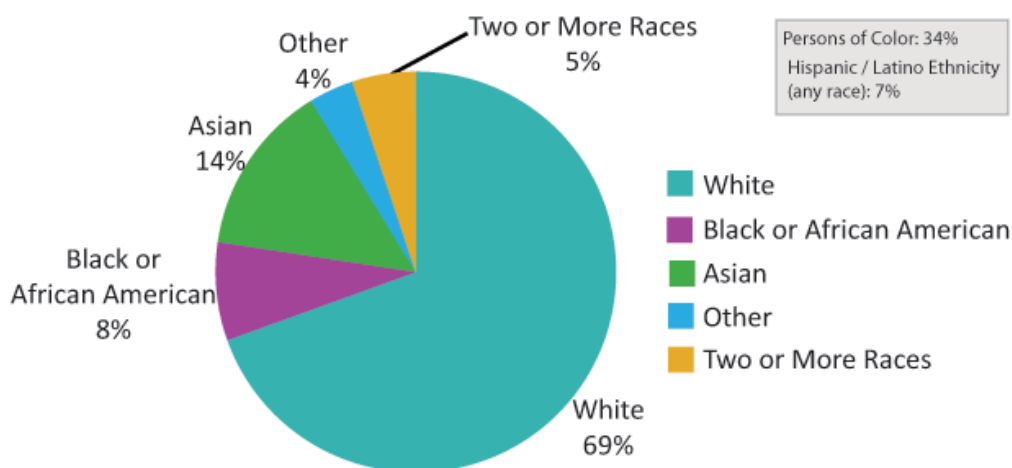
☐ All Seattle neighborhoods

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

☐ 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:

Race and Ethnicity

Persons of Color: 34%
Hispanic / Latino Ethnicity (any race): 7%

- White
- Black or African American
- Asian
- Other
- Two or More Races

Other 4%
Two or More Races 5%
Asian 14%
Black or African American 8%
White 69%

Sources: 2010 Census, U.S. Census Bureau

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: [Respond here.]

Location of meeting: [Respond here.]

Summary of discussion:

[Respond here, if applicable.]

☐ Full meeting transcript, including City attendees, community leaders in attendance, and attendee demographic data, is attached as an appendix to the SIR

☐ **Engagement for Public Comment #2**

Date of meeting: [Respond here.]

Location of meeting: [Respond here.]

Summary of discussion:

[Respond here, if applicable.]

☐ Full meeting transcript, including City attendees, community leaders in attendance, and attendee demographic data, is attached as an appendix to the SIR

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

Date of meeting: [Respond here.]

Location of meeting: [Respond here.]

Summary of discussion:

[Respond here, if applicable.]

☐ Full meeting transcript, including City attendees, community leaders in attendance, and attendee demographic data, is attached as an appendix to the SIR

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

Number of feedback submissions received: [Respond here.]

Summary of feedback: [Respond here.]

Open comment period: [Respond here.]

☐ Complete compilation of feedback is attached an as an appendix to the SIR

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

Date of presentation: [Respond here,]

Summary of comments:

[Respond here.]

☐ Complete meeting minutes and comments are attached an as an appendix to the SIR
☐ Any letters of feedback by CTAB members are attached as an appendix to the SIR

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.)*

[Respond to question 2.4 here.]

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.*

[Respond to question 2.5 here.]

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?

[Respond to question 3.1 here.]

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

[Respond to question 3.1 here.]

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

[Respond to question 3.1 here.]

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

[Respond to question 3.1 here.]

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:

[Respond here.]

Policy Strategies:

[Respond here.]

Partnership Strategies:

[Respond here.]

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:

[Respond here, if applicable.]

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.

[Respond to question 5.2 here.]

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

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?

[Respond to question 5.5 here.]

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).

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.]

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.

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.
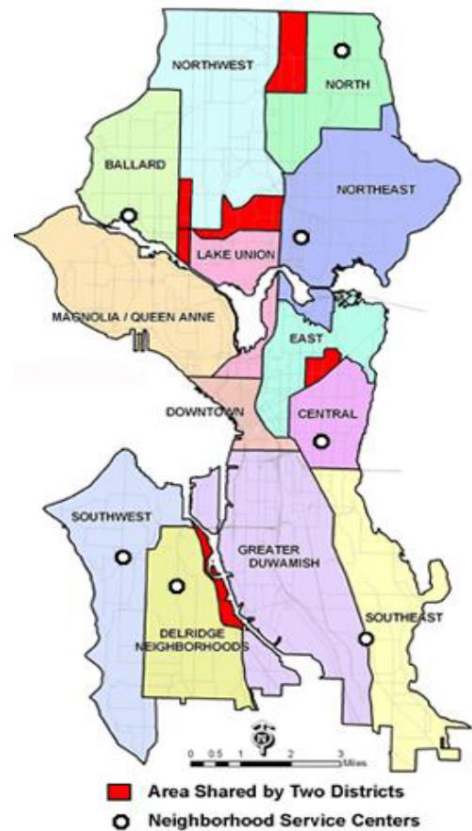
APPENDIX B: PUBLIC COMMENT DEMOGRAPHICS AND OVERVIEW

APPENDIX C: PUBLIC MEETING NOTICE(S)

APPENDIX D: MEETING SIGN-IN SHEET(S)

APPENDIX E: MEETING TRANSCRIPT(S)

APPENDIX F: LETTERS FROM ORGANIZATIONS

APPENDIX H: EMAILS FROM THE PUBLIC

APPENDIX I: LETTERS FROM THE PUBLIC