September 17, 2019

Attachment 3. Clean CSIR for LPR

2019 Condensed Surveillance Impact Report (CSIR)

License Plate Readers

Seattle Department of Transportation

September 17, 2019

Attachment 3. Clean CSIR for LPR

Overview

The Operational Policy statements in this document represent the only allowable uses of the equipment and data collected by this technology.

This CSIR documents information about the collection, use, sharing, security and access controls for data that is gathered through Seattle Department of Transportation's (SDOT) License Plate Reader (LPR) system. All information provided here is contained in the body of the full SIR document but is provided in a condensed format for easier access and consideration.

1.0 Purpose

Operational Policy:

1. The SDOT LPR System and the travel time information produced by it is used only for system engineering, traffic planning, and public distribution purposes.

2. SDOT shall develop standard training for operation of the LPR System in accordance with this Section and with any additional applicable SDOT policies, as should WSDOT, and only employees who have undergone such training may access or use the SDOT LPR System.

Travel time, or the time required to navigate a route between any two points of interest, is an essential measure in transportation. One way SDOT collects travel time information in the City is by leveraging LPR cameras. LPR systems consist of high-speed cameras combined with advanced computer algorithms capable of converting the images of license plates into computer-readable data. The conversion occurs in Washington State Department of Transportation (WSDOT) systems. This information is then used to create travel times for system engineering, traffic planning, and public distribution purposes.

2.0 Data Collection and Use

Operational Policy:

1. **The SDOT LPR system is built strictly for traffic management and optimization. No raw data that includes license plate numbers is stored or used by SDOT or other departments or agencies for any other purposes.**

2. **Each raw data record will be comprised of: Time stamp, station identifier, camera channel, alphanumeric plate string, and confidence factor.**

LPRs function through pairing cameras with computer software: cameras record an image of a plate, and then a computer translates the image into alphanumeric characters the system can understand. Once the camera(s) capture an image of acceptable quality, the image is sent to a computer system that analyzes the image, identify and isolate a license plate, and reduce the image into the essential alphanumeric characters. This LPR data is

shared with WSDOT for the purposes of calculating travel times. The travel time data is then provided back to SDOT, and the raw license plate data is deleted.

3.0 Data Minimization & Retention

Operational Policy:

1. **License Plate data is immediately deleted when the travel time is calculated by WSDOT and that calculated travel time is then sent back to SDOT.**
2. **No license plate information captured to create travel times is stored or used by SDOT, nor is it provided to other entities directly, or pooled into regional sharing systems and is only used for traffic management purposes.**

SDOT receives the travel times back from WSDOT from the publicly available Application Programming Interface (API). Neither WSDOT nor SDOT store any personally identifiable information through this process.

4.0 Access & Security

Operational Policy:

1. **Acceptable reasons for access to the equipment include initial device configuration and issue troubleshooting.**
2. **Access to the data is only permitted to perform traffic analysis, conduct research, create reports, or connect to the API with software applications. No entity other than SDOT and WSDOT shall access or use the SDOT LPR data, other than processed data such as travel time data.**
3. **LPR cameras are installed by either qualified SDOT personnel, or authorized electrical contractors associated with a project. Except for third party vendors installing or maintaining a system, no entity other than SDOT and WSDOT shall access or use the SDOT LPR System.**
4. **The LPR's are remotely accessible only by members of the SDOT TOC Technical Team.**
5. **Each device is protected by a username password combination that is only known by SDOT staff members.**
6. **WSDOT immediately processes the travel time information, deletes the license plate numbers or source data, never storing any information about the license plates used to create them.**

Access

The LPR's are remotely accessible by the SDOT TOC Technical Team who are solely responsible for troubleshooting technical issues to ensure that the devices are functioning as expected

Acceptable reasons for access to the equipment include initial device configuration or issue troubleshooting. Access to the travel time information is permitted to perform traffic analysis, conduct research, create reports, or connecting to the API with software applications.

All aggregated traffic travel times will be accessed by SDOT personnel, or by applications leveraging the WSDOT API.

Specific Senior SDOT TOC Operators receive training on how to create new travel time routes. Applications of travel time information include signal timing & coordination, traffic network optimization, street parking congestion analysis, congestion mapping, route planning, work zone congestion enforcement, variable message signs, incident detection, emergency responder routing and route utilization.

Security

The LPR's are only remotely accessible by members of the SDOT TOC Technical Team who are responsible for ensuring that the devices are functioning as expected. Each device is protected by a username and password combination that is only known by the Technical staff, and they access the LPR cameras as needed to troubleshoot technical issues.

5.0 Data Sharing and Accuracy

Operational Policy:

1. **SDOT shares LPR data with the Washington State Department of Transportation (WSDOT) for the purpose of facilitating information processing and distribution of travel times between defined locations. SDOT and WSDOT must have a written agreement pertaining to sharing LPR data.**

2. **With respect to LPRs, with the exception of system set-up or troubleshooting, WSDOT shall share with SDOT only travel time information calculated as per the Surveillance Impact Report.**

3. **SDOT system users are trained on how to create new travel times routes.**

4. **Applications of travel time information in the Department include: signal timing and coordination, Traffic network optimization, street parking congestion analysis, congestion mapping, route planning, work zone congestion enforcement, variable**

message signs, incident detection, emergency responder routing and route utilization.

SDOT shares LPR data with WSDOT for the purpose of facilitating information processing and distribution of travel times between defined data stations. Data sharing is necessary because WSDOT processes the LPR data and provides SDOT travel times based on that information. SDOT and WSDOT have established an intergovernmental data network to facilitate the data exchange. WSDOT receives that data and then creates a travel time between two or more defined data locations (LPR sites). WSDOT processes the travel time information and then deletes the raw data, never storing any information about the license plates used to create them.

Per the City of Seattle's Privacy Statement, outlining commitments to the public about how the City collects and manages public data: *We do not sell personal information to third parties for marketing purposes or for their own commercial use.* The full Privacy Statement may be found **here.**

6.0 Equity Concerns

Operational Policy:

1. **SDOT installs LPR based on street transportation volumes and locations based on gaps in travel time coverage along corridors identified in the SDOT ITS Strategic Plan.**

SDOT installs LPR based on street transportation volumes and related technical criteria (e.g., based on gaps in travel time coverage along corridors specified in the SDOT ITS Strategic Plan). SDOT does not save raw data or license plate images, so there is no way to direct other agency enforcement that might be seen as focusing on historically targeted communities.