

# Surveillance Usage Review: Seattle Department of Transportation License Plate Readers

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PRESENTATION TO THE TRANSPORTATION & UTILITIES COMMITTEE  
JANUARY 20, 2021



# Surveillance Ordinance Questions

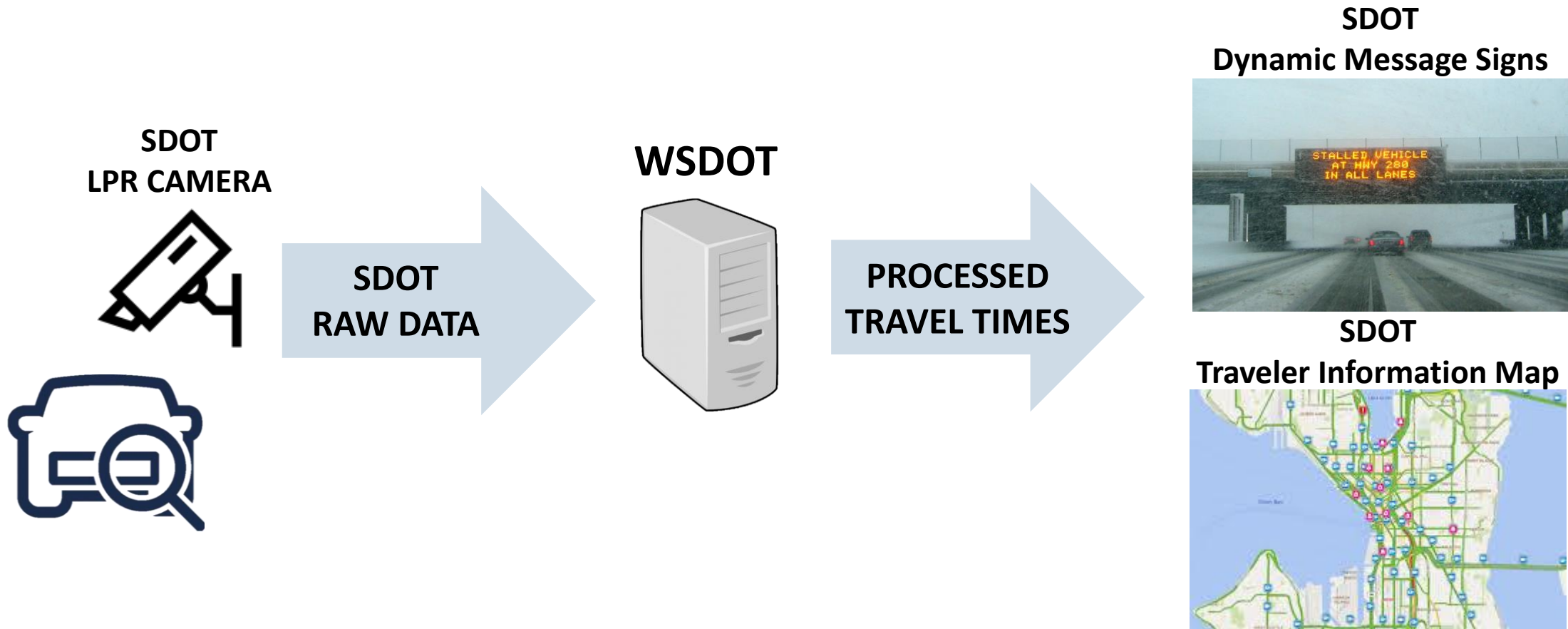
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Ordinance 125376 asked us to review:

- A. How the technology has been used, how frequently, and whether usage patterns are changing over time;
- B. How often the technology or its data are being shared with other entities, including other governments in particular;
- C. How well data management protocols are safeguarding individual information;
- D. How deployment of the technology impacted or could impact civil liberties or have disproportionate effects on disadvantaged populations, and how those impacts are being mitigated;
- E. A summary of any complaints or concerns received by or known by departments about the technology and results of any internal audits or other assessments of code compliance;
- F. Total annual costs for use of the technology, including personnel and other ongoing costs.



# SDOT – WSDOT Data Sharing



# LPR Phase Out to Acyclica

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- SDOT plans to replace License Plate Readers technology with Acyclica technology this year.
- The City Council will review Acyclica technology in the future.



# Key Audit Takeaways

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## Two Key Audit Issues:

1. No written data sharing agreement with WSDOT  
(1 recommendation)
2. Address possible vulnerabilities in the LPR system  
(1 recommendation)

## Other Audit Issues:

3. Policies need to be revised to reflect actual practices  
(5 recommendations)
4. Inconsistencies between SIR and CSIR documents  
(2 recommendations)



# Question A: Technology Use

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1. SDOT is using the technology per policy.
2. SDOT has not used the technology for enforcement purposes, per policy.
3. LPR cameras are always on.



# Question B: Technology and Data Sharing

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1. SDOT sends raw data to WSDOT and then WSDOT provides SDOT travel time information, but there is no written data sharing agreement between SDOT and WSDOT.
2. Although anonymized, WSDOT holds the data in temporary files for 7 days.
3. Cybersecurity risks could result in LPR data being shared with unauthorized parties and therefore could affect civil liberties.



# Question C: Data Management Protocols

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1. Due to lack of records, we could not determine if system was installed by qualified personnel.
2. Access is properly limited to certain personnel.
3. Access is protected by username and password.
4. Need to define “standard training” and who is required to take it.
5. Collection of vehicle or occupant images is prohibited but images are temporarily held in LPR cameras.





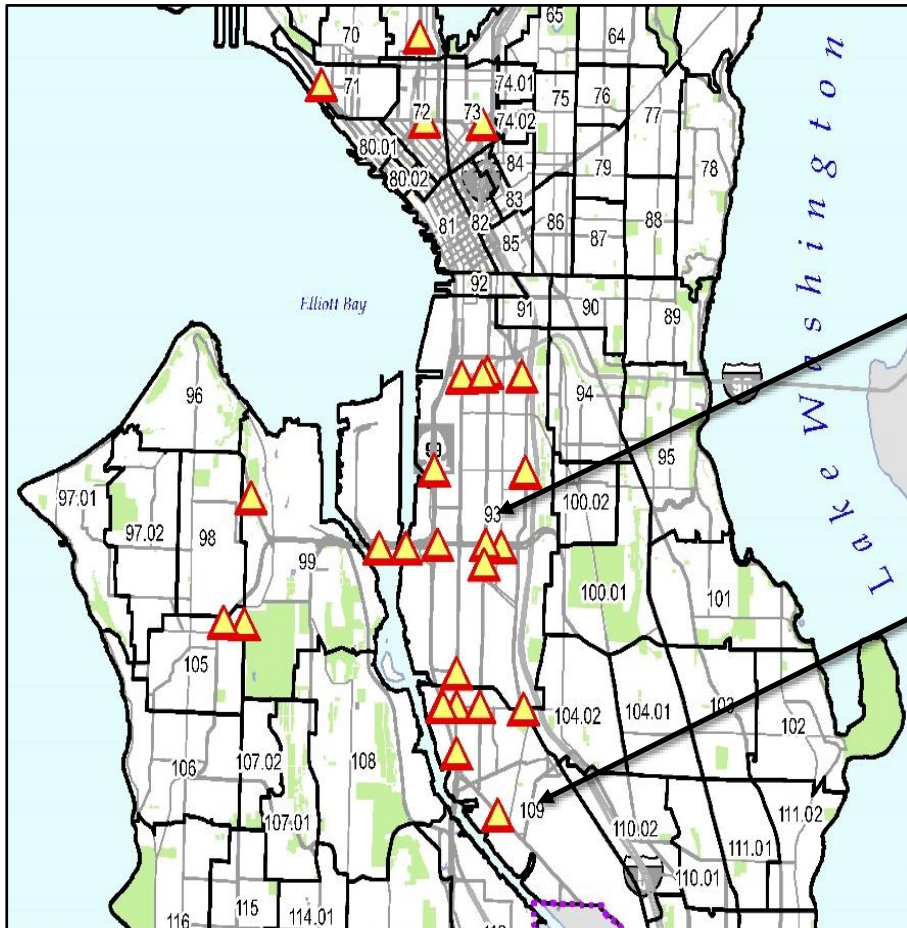
## Sample images from LPR cameras



Only raw data, not images are sent to WSDOT



# Question D: Civil Liberties Impact



**Census Tract 93:  
contains 27  
cameras**

**Census Tract 109:  
contains 15  
cameras**

1. We could not determine deployment impacts of the technology on civil liberties in terms of its use and locations.
2. Observations from mapping
  - 42% of cameras are located in two census tracts.
  - These tracts have low population density, but higher proportion of disadvantaged residents.



# Question E: Complaints and Assessments

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1. We did not identify any privacy or civil liberties-related complaints or concerns about the LPR system.
2. We identified one in-scope assessment
  - 2015 Security Assessment of SDOT's Traffic Management Network of the Transportation Operations Center



# Question F: Costs

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	2019	January – June 2020
Personnel	\$ 2,211	\$ 5,118
Maintenance & Replacement	\$ 166	\$ 0
<b>Total Costs</b>	<b>\$ 2,377</b>	<b>\$ 5,118</b>

- Personnel costs were estimated by SDOT
- Estimate for all of 2020 = \$10,000



# Next Steps

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- SDOT concurred with all 9 recommendations.
- We will follow-up on the implementation status.
- SDOT plans to replace all LPR cameras with Acyclica cameras in 2021.



# Acknowledgements and Questions

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We appreciate SDOT's cooperation and assistance.

A copy of our report can be found on our website at:

<https://www.seattle.gov/cityauditor/reports>

Questions?

