



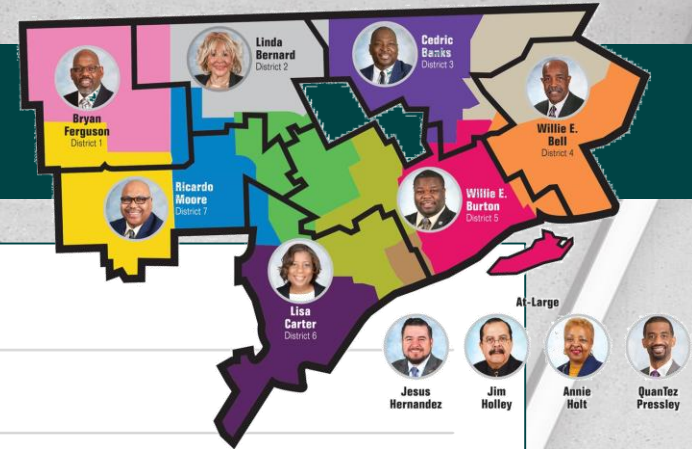
Board of Police Commissioners

LPR Public Hearing and Spec Report Negotiations Update

May 18, 2023



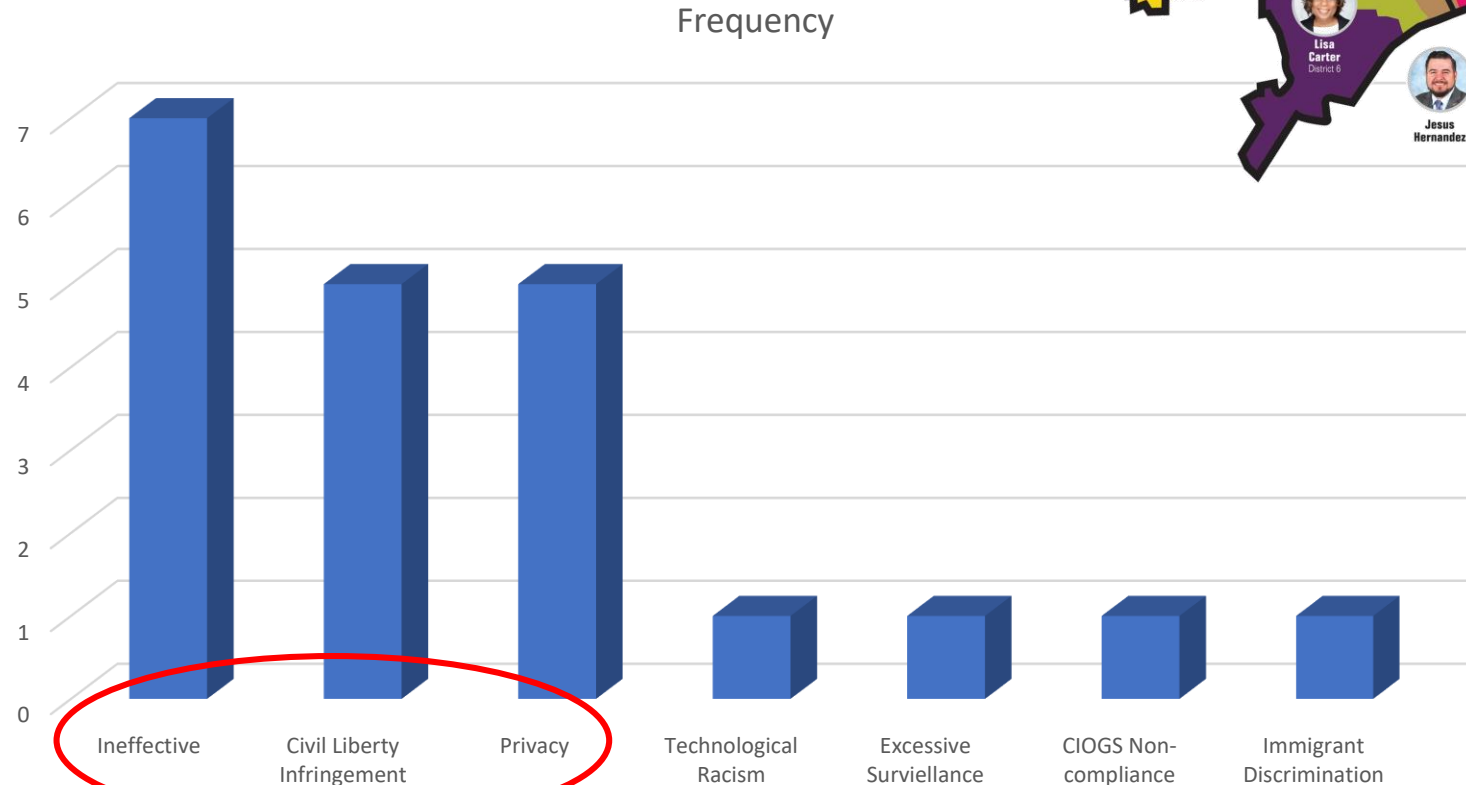
Public Feedback



5/11 Public Hearing

15 members of the public commented on LPRs during the Public Hearing or General Public Comments

- 15 – do not support LPRs
- 0 – support LPRs

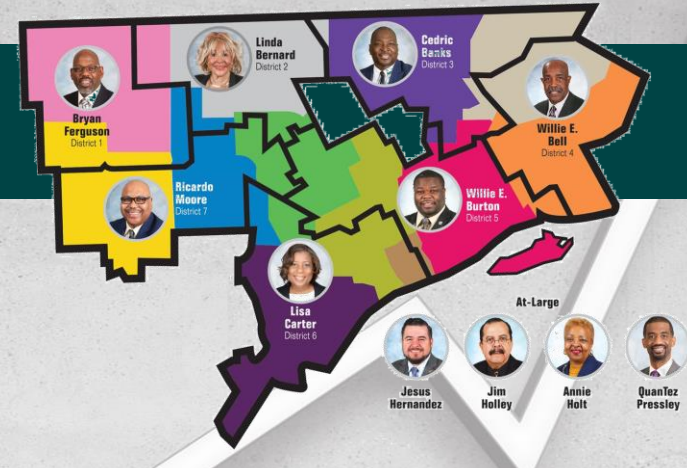


Email Feedback

4 emails received by bopc@detroitmi.gov

- 1 – support LPRs
- 1 – support if proven effective
- 2 – do not support LPRs

Data Management Matters



The longer data is stored, risks increase for breaches and/or inappropriate usage.

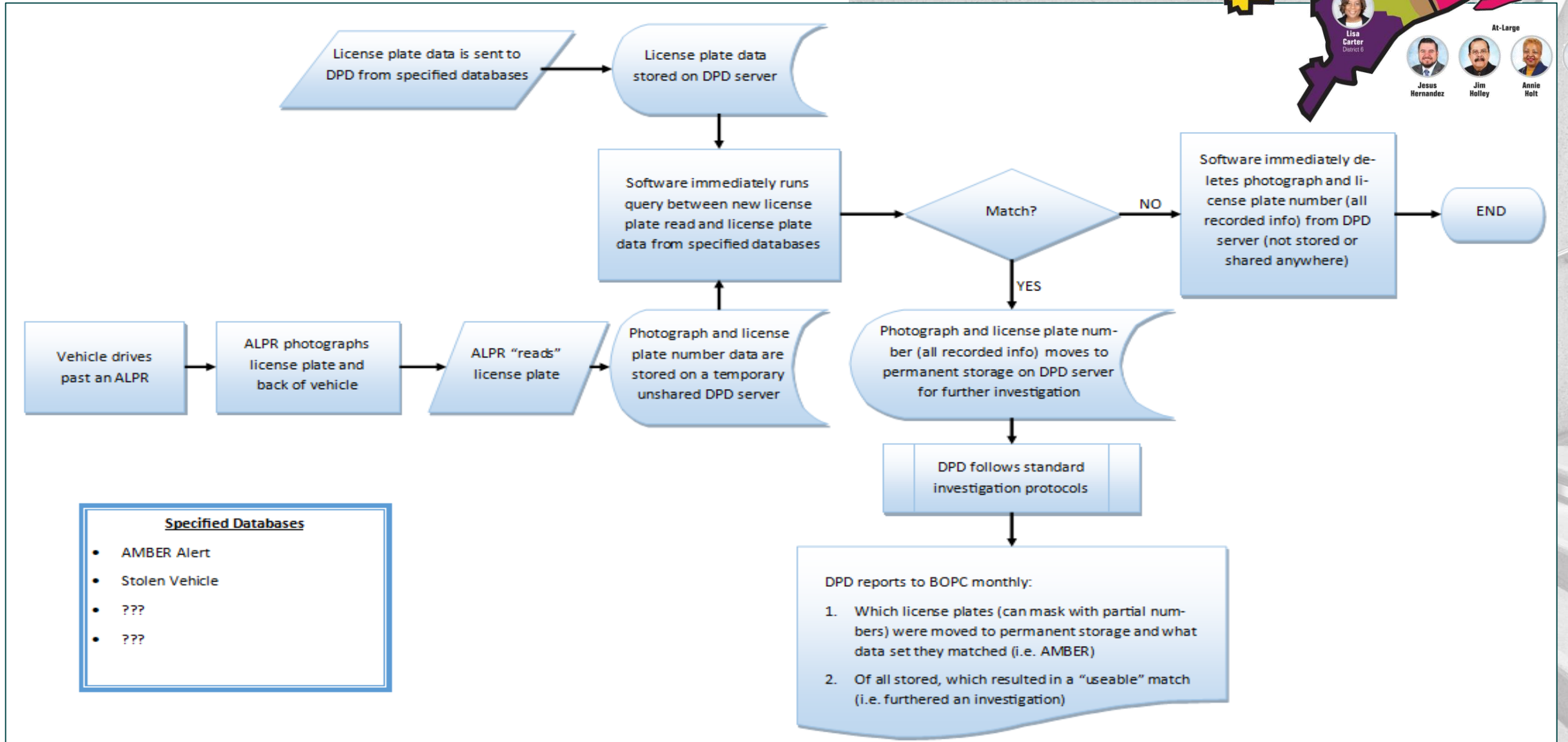
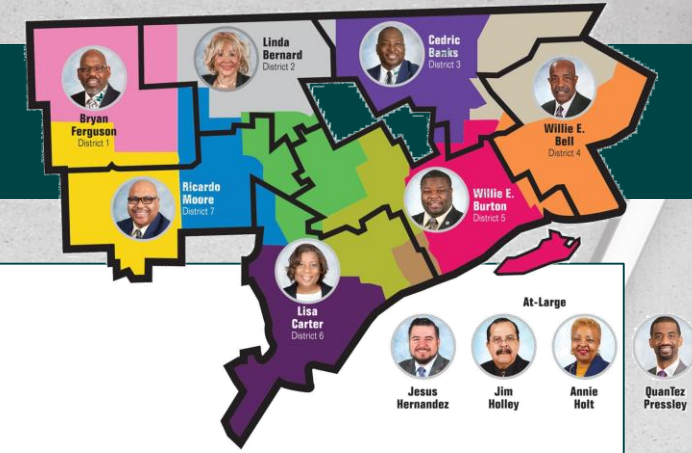
Location*	Population*	Data Policy*	Stored Plate Reads*
Grapevine, TX	47,000	None	2 million (as of 8/29/12)
Milpitas, CA	67,000	None	4.7 million (as of 8/2/12)
Jersey City, NJ	250,000	Delete after 5 years	10 million (as of 8/2/12)
Minnesota State Patrol	5.3 million	Delete after 48 hours	Less than 20,000

DPD Data Retention
(per current spec report draft)

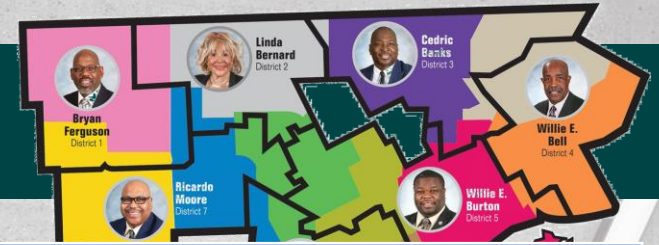
- LPR Data (in general) – 1 year
- Reads not being used in a criminal investigation
 - Flock cameras – 30 days
 - Motorola Vigilant and Genetec cameras – 90 days

*Sourced from ACLU website: <https://www.aclu.org/issues/privacy-technology/location-tracking/you-are-being-tracked>

Data Management BOPC Proposal



Oversight Reporting: Aggregate vs Itemized



Aggregate/Summarized

	May 13	
Total Hot List Hits:		38

EXAMPLE

Does not support effective oversight

For example, on a routine tax return totals are provided

Itemized/Raw

	A	B	C	D
1	Read Date	Masked Plate	Hot List Hit	Verified "Useful"
2	17-May	*****	None	
3	17-May	NM*****	Stolen	No
4	17-May	*****	None	
5	17-May	*****	None	
6	17-May	*****	None	
7	17-May	O2*****	Stolen	Yes
8	17-May	9F*****	Other Example 1	No
9	17-May	8J*****	AMBER	Yes
0	18-May	*****	None	
1	18-May	*****	None	
2	18-May	*****	None	
3	18-May	*****	None	
4	18-May	*****	None	
5	18-May	RI*****	Stolen	No
6	18-May	*****	None	
7	18-May	SD*****	Other Example 2	No
8	18-May	86*****	None	

EXAMPLE

BOPC Staff will aggregate/summarize as needed.
Supports oversight, BOPC can analyze and inspect for:

- Appropriate use of the technology
- Trends over time
- Accuracy of the aggregation
- Anomalies that should be researched further
- Effectiveness of technology for future decisions

In an IRS audit, the itemization behind those totals is required to verify the totals and that the appropriate items are included, excluded, and categorized.



JuanTos resolley

Specification Report Language Negotiations

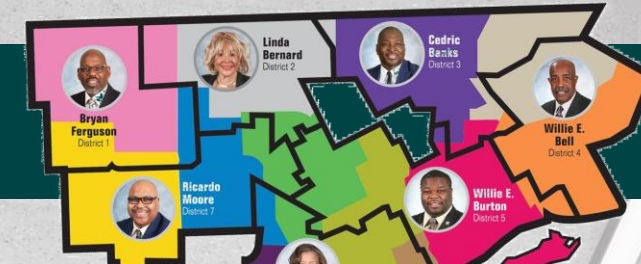


Change Requested	Outcome
Clarify that technology is able to capture driver, passengers, and personal property, but that is not the intent of the technology	Done
Clarify that automatic comparison of “information” is specifically “license plates”	Done
Oversight Reporting: Specified reporting elements be delivered to BOPC within 15 days of DPD identifying that protected information has been collected	Done
Clarify that the retention policy referenced is a DPD-only policy and is in compliance with Michigan Law	Done
Oversight Reporting: Indicate that DPD will provide BOPC with a list of DPD members with LPR technology access.	Done
Prohibit taking photographs of personal property	Prohibit willfully taking photographs of personal property and individuals
Oversight Reporting: Indicate how many law enforcement agencies DPD has Data Sharing Agreements with	Currently 31, and needs to be added to the Spec Report; and DPD agreed to update BOPC monthly
Oversight Reporting: Indicate that DPD will provide BOPC with a list of agencies DPD has Data Sharing Agreements with	Did not put this language in the report, but agreed to provide the list to BOPC and update monthly
Immediate deletion of protected information collected by the technology	Deletion as soon as practical
Store data on DPD servers rather than “centralized location”	Not DPD servers, but secured vendor servers that meet federal security standards



QuanTez Pressley

Specification Report Language Negotiations

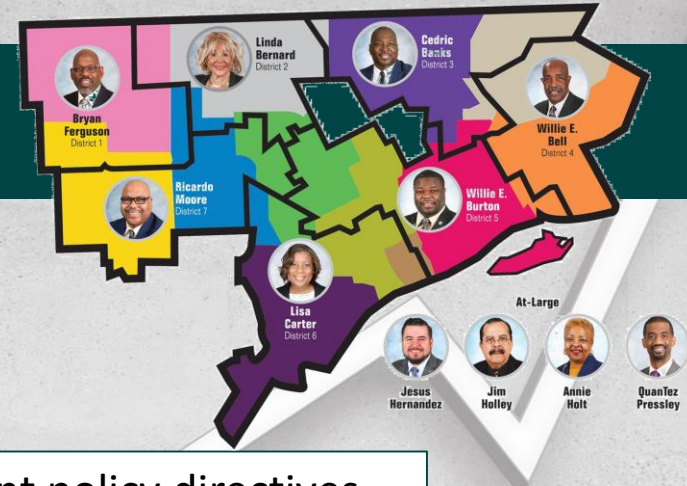


Change Requested	Outcome
Agree on the proposed Data Management flowchart and add to Report or as a supplemental document	Agreed to work on coming to an agreement on a data management flowchart as a supplemental document, but not started yet
Ensure that license plate reads that do not have a match in a “hot list” are not stored (immediately destroyed).	Not done
Ensure that license plate reads that do not have a match in a “hot list” are not shared.	Not done
Indicate that DPD will not enter into Data Sharing Agreements with non-law enforcement entities for sharing LPR data at all or without BOPC approval.	Not done
Ensure that law enforcement agencies with Data Sharing Agreements only use the data the way DPD does (i.e. will not use for Child Support warrant)	Not done
Oversight Reporting: Monthly list of masked license plate reads that were a hit, so eligible for storage and sharing, and the hot list they match (i.e. AMBER)	Will not provide data, only aggregate numbers which cannot be verified
Oversight Reporting: Of the hits, which were “usable” matches (i.e. furthered an investigation)	Not done
Periodic audit (i.e. every 30 days) to determine if protected information has been collected.	Not done



QuanTaz Pressley

Remaining Work



- Continue to work with DPD to finalize the LPR Specification Report and relevant policy directives to address the public's concerns around privacy, civil rights infringement, and effectiveness.
 - Data Retention and Sharing Parameters
 - Data Management Proposal
 - Oversight Reporting to BOPC
 - DPD Policy Directive 101.12-Data-Sharing
- Continue to obtain public feedback.
- Board votes on the LPR Surveillance Technology Specification Report.

Note: Once BOPC votes to approve the Specification Report, DPD will be approved to move forward with the next steps in the procurement process and more burden will shift to the public to address the remaining concerns later in the process.