

File No. 241181

Committee Item No. 3

Board Item No. \_\_\_\_\_

## COMMITTEE/BOARD OF SUPERVISORS

### AGENDA PACKET CONTENTS LIST

Committee: Rules Committee

Date Feb 3, 2025

Board of Supervisors Meeting

Date \_\_\_\_\_

#### Cmte Board

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- Introduction Form
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#### OTHER (Use back side if additional space is needed)

- Surveillance Technology Policy
- \_\_\_\_\_
- \_\_\_\_\_
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Completed by: Victor Young

Date Jan 30, 2025

Completed by: \_\_\_\_\_

Date \_\_\_\_\_

1 [Administrative Code - Amended Airport Surveillance Technology Policy]

2

3 **Ordinance approving the Amended Airport Surveillance Technology Policy governing**  
4 **the use of Automated License Plate Readers - Ground Transportation Management**  
5 **System and Parking Assist - Parking Guidance System.**

6

7 NOTE: **Unchanged Code text and uncodified text** are in plain Arial font.  
8 **Additions to Codes** are in *single-underline italics Times New Roman font*.  
9 **Deletions to Codes** are in ~~*Times New Roman font*~~.  
10 **Board amendment additions** are in Arial font.  
11 **Board amendment deletions** are in ~~Arial font~~.  
12 **Asterisks (\* \* \* \*)** indicate the omission of unchanged Code  
13 subsections or parts of tables.

11

12 Be it ordained by the People of the City and County of San Francisco:

13

14 Section 1. Background.

15 (a) Terms used in this ordinance shall have the meaning set forth in Administrative  
16 Code Chapter 19B (“Chapter 19B”).

17 (b) Chapter 19B regulates City Departments’ acquisition and use of Surveillance  
18 Technology. Under Section 19B.5, City Departments that possessed or were using  
19 Surveillance Technology before Chapter 19B took effect in July 2019 must obtain Board of  
20 Supervisors approval by ordinance of a Surveillance Policy for each type of existing  
21 Surveillance Technology. Under Section 19B.2, a Department must obtain Board approval by  
22 ordinance of a Surveillance Technology Policy before: (1) seeking funds for Surveillance  
23 Technology; (2) acquiring or borrowing new Surveillance Technology; (3) using new or  
24 existing Surveillance Technology for a purpose, in a manner, or in a location not specified in a  
25 Surveillance Technology Policy ordinance approved by the Board in accordance with Chapter

1 19B; (4) entering into agreement with a non-City entity to acquire, share, or otherwise use  
2 Surveillance Technology; or (5) entering into an oral or written agreement under which a non-  
3 City entity or individual regularly provides the Department with data or information acquired  
4 through the entity's use of Surveillance Technology.

5 (c) Under Administrative Code Section 19B.2(b), the Board of Supervisors may  
6 approve a Surveillance Technology Policy ordinance under Section 19B.2(a) if: (1) the  
7 department seeking Board approval first submits to the Committee on Information Technology  
8 (COIT) a Surveillance Impact Report for the Surveillance Technology to be acquired or used;  
9 (2) based on the Surveillance Impact Report, COIT develops a Surveillance Technology  
10 Policy for the Surveillance Technology to be acquired or used; and (3) at a public meeting at  
11 which COIT considers the Surveillance Technology Policy, COIT recommends that the Board  
12 adopt, adopt with modification, or decline to adopt the Surveillance Technology Policy for the  
13 Surveillance Technology to be acquired or used.

14 (d) The Airport submitted an Amended Surveillance Technology Policy for the  
15 Automated License Plate Readers - Ground Transportation Management System and Parking  
16 Assist – Parking Guidance System to COIT. Between June 27, 2024 and September 19,  
17 2024, COIT and its Privacy and Surveillance Advisory Board (PSAB) conducted two public  
18 hearings at which they considered Airport Surveillance Impact Reports and the Amended  
19 Surveillance Technology Policy for the Automated License Plate Readers - Ground  
20 Transportation Management System and Parking Assist – Parking Guidance System.

21 (e) On September 19, 2024, COIT voted to recommend the Amended Automated  
22 License Plate Readers - Ground Transportation Management System and Parking Assist –  
23 Parking Guidance System Policy to the Board for approval.

1 (f) The Amended Surveillance Technology Policy is available in Board File No.  
2 241181. COIT recommended that the Board approve the Amended Surveillance Technology  
3 Policy.

4 (g) This ordinance sets forth the Board's findings in support of the Amended  
5 Surveillance Technology Policy and its approval of the Policy.  
6

7 Section 2. Automated License Plate Readers - Ground Transportation Management  
8 System and Parking Assist – Parking Guidance System Usage.

9 (a) The Airport currently possesses and uses Automated License Plate Readers -  
10 Ground Transportation Management System and Parking Assist – Parking Guidance System.

11 (b) The Airport uses the Automated License Plate Readers - Ground Transportation  
12 Management System and Parking Assist – Parking Guidance System to: (1) Track the activity  
13 of permitted commercial ground transportation at the Airport. Also to use as a method for  
14 collecting trip fees or assessing citations. (2) Support the Airport and local, state, federal, and  
15 regional public safety departments in the identification of vehicles associated with targets of  
16 investigations, including locating stolen, wanted, and/or other vehicles that are the subject of  
17 investigation; and/or locating victims, witnesses, suspects, and others associated with a law  
18 enforcement investigation. (3) Help guide customers to available parking spaces. (4) Help  
19 customers locate their vehicles if they forget where they parked.

20 Section 3. Findings and Approval of the Policy.

21 (a) The Board of Supervisors hereby finds that the benefits that the Amended  
22 Automated License Plate Readers - Ground Transportation Management System and Parking  
23 Assist – Parking Guidance System Policy authorizes outweigh the costs and risks; that the  
24 Amended Automated License Plate Readers - Ground Transportation Management System  
25 and Parking Assist – Parking Guidance System Policy will safeguard civil liberties and civil

1 rights; and that the uses and deployments of Automated License Plate Readers - Ground  
2 Transportation Management System and Parking Assist – Parking Guidance System, as set  
3 forth in the Amended Automated License Plate Readers - Ground Transportation  
4 Management System and Parking Assist – Parking Guidance System Policy, will not be based  
5 upon discriminatory or viewpoint-based factors or have a disparate impact on any community  
6 or Protected Class.

7 (b) The Board of Supervisors hereby approves the Amended Automated License Plate  
8 Readers - Ground Transportation Management System and Parking Assist – Parking  
9 Guidance System Policy.

10  
11 Section 4. Effective Date.

12 This ordinance shall become effective 30 days after enactment. Enactment occurs  
13 when the Mayor signs the ordinance, the Mayor returns the ordinance unsigned or does not  
14 sign the ordinance within ten days of receiving it, or the Board of Supervisors overrides the  
15 Mayor’s veto of the ordinance.

16  
17 APPROVED AS TO FORM:  
18 DAVID CHIU, City Attorney

19 By: /s/ Andrew A. Angeles  
20 ANDREW A. ANGELES  
21 Deputy City Attorney

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25  
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**LEGISLATIVE DIGEST**

[Administrative Code - Amended Airport Surveillance Technology Policy]

**Ordinance approving the Amended Airport Surveillance Technology Policy governing the use of Automated License Plate Readers - Ground Transportation Management System and Parking Assist - Parking Guidance System.**

**Background Information**

Chapter 19B regulates City Departments' acquisition and use of Surveillance Technology.

Under Chapter 19B.5, City Departments that possessed or were using Surveillance Technology, as defined in the chapter, before Chapter 19B took effect in July 2019 must obtain Board of Supervisors approval by ordinance of a Surveillance Policy, as that term is defined in Chapter 19B, for each type of existing Surveillance Technology.

Under Chapter 19B.2, a department seeking to use or acquire Surveillance Technology must obtain Board of Supervisors' approval by ordinance of a Surveillance Technology Policy before: (1) seeking funds for Surveillance Technology; (2) acquiring or borrowing new Surveillance Technology; (3) using new or existing Surveillance Technology for a purpose, in a manner, or in a location not specified in a Surveillance Technology Policy ordinance approved by the Board in accordance with Chapter 19B; (4) entering into agreement with a non-City entity to acquire, share, or otherwise use Surveillance Technology; or (5) entering into an oral or written agreement under which a non-City entity or individual regularly provides the department with data or information acquired through the entity's use of Surveillance Technology.

Beginning in June 2024, the Committee on Information Technology ("COIT") and its Privacy and Surveillance Advisory Board ("PSAB") subcommittee conducted multiple public hearings, at which COIT and its PSAB considered Airport Surveillance Impact Reports and the Amended Surveillance Technology Policy for Automated License Plate Readers (ALPR) – Ground Transportation Management System (GTMS) and Park Assist – Parking Guidance System.

Following those hearings, COIT approved the final draft of the Amended Surveillance Technology Policy for Automated License Plate Readers (ALPR) – Ground Transportation Management System (GTMS) and Park Assist – Parking Guidance System. The Amended Surveillance Technology Policy that COIT developed are detailed in Sections 2 and 3 of the proposed ordinance. The Surveillance Technology Policy is available in Board File No. \_\_\_\_\_. COIT recommended that the Board of Supervisors approve the Amended Surveillance Technology Policy in the proposed ordinance.

AIRPORT COMMISSION

CITY AND COUNTY OF SAN FRANCISCO

RESOLUTION NO. 23-0103

**RESOLUTION AUTHORIZING THE AIRPORT TO SEEK BOARD OF SUPERVISORS' APPROVAL OF AIRPORT SURVEILLANCE TECHNOLOGY POLICIES AND ANNUAL SURVEILLANCE REPORT PURSUANT TO CHAPTER 19B OF THE SAN FRANCISCO ADMINISTRATIVE CODE GOING FORWARD**

WHEREAS, based on the City's Surveillance Technology Ordinance, San Francisco Administrative Code Chapter 19B (Ordinance or Chapter 19B), adopted by the Board of Supervisors (Board) in 2019, the Airport must obtain Board approval for its Surveillance Technology Policies and Annual Surveillance Report (Policies); and

WHEREAS, Chapter 19B, which has been in effect since July 2019, regulates City departments' acquisition and use of Surveillance Technology, as defined in the Ordinance, and requires that departments adopt Board-approved Policies for each item of Surveillance Technology they currently use or plan to acquire; and

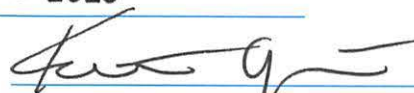
WHEREAS, until recently, the City's Committee on Information Technology (COIT) took the responsibility of obtaining that approval for all City departments, including the Airport, but recently revised procedures now require departments, rather than COIT, to seek such approval from the Board; and

WHEREAS, as a result, Staff requests authorization for the Airport to seek Board approval for these Policies going forward; now, therefore, be it

RESOLVED, that this Commission authorizes the Airport to seek approval for the Airport Surveillance Technology Policies and its Annual Surveillance Report from the Board of Supervisors pursuant to Chapter 19B of the San Francisco Administrative Code going forward.

*I hereby certify that the foregoing resolution was adopted by the Airport Commission  
at its meeting of* \_\_\_\_\_

APR 18 2023

  
Secretary



San Francisco International Airport

**MEMORANDUM**

April 18, 2023

TO: AIRPORT COMMISSION  
Hon. Malcolm Yeung, President  
Hon. Everett A. Hewlett, Jr.  
Hon. Jane Natoli  
Hon. Jose F. Almanza

23-0103

APR 18 2023

FROM: Airport Director

SUBJECT: Authorization for the Airport to Seek Board of Supervisors' Approval of Airport Surveillance Technology Policies and Annual Surveillance Report Pursuant to Chapter 19B of the San Francisco Administrative Code Going Forward

DIRECTOR'S RECOMMENDATION: ADOPT RESOLUTION AUTHORIZING THE AIRPORT TO SEEK BOARD OF SUPERVISORS' APPROVAL OF AIRPORT SURVEILLANCE TECHNOLOGY POLICIES AND ANNUAL SURVEILLANCE REPORT PURSUANT TO CHAPTER 19B OF THE SAN FRANCISCO ADMINISTRATIVE CODE GOING FORWARD.

**Executive Summary**

In June of 2019, the San Francisco Board of Supervisors (Board) passed an amendment to the City's Administrative Code – Acquisition of Surveillance Technology ordinance to monitor, regulate and require reporting for City department's acquisition and use of Surveillance Technology, as defined in the ordinance, which is codified at Administrative Code Chapter 19B (Ordinance or Chapter 19B).

Under the Ordinance, City departments are required to obtain Board approval of Surveillance Technology Policies and an Annual Surveillance Report (Policies). Until recently, as described below, the City's Committee on Information Technology (COIT) took responsibility for obtaining that approval. But, recently revised procedures now require City departments, rather than COIT, to seek it. As a result, Staff requests that the Commission authorize the Airport to seek such approval by the Board going forward. The three policies that the Airport plans to submit to the Board in the near future are: Application Based Commercial Transport (ABCT), Electronic Toll Readers (ETR) and Gunshot Detection Solution (GDS) technologies.

THIS PRINT COVERS CALENDAR ITEM NO. 9



## **Background**

Chapter 19B, which has been in effect since July 2019, regulates City departments' acquisition and use of Surveillance Technology, defined below, and requires that departments adopt Board-approved Policies for each item of Surveillance Technology they currently use or plan to acquire. The Ordinance's definition of Surveillance Technology is very broad as follows,

“Surveillance Technology” means any software, electronic device, system utilizing an electronic device, or similar device used, designed, or primarily intended to collect, retain, process, or share audio, electronic, visual, location, thermal, biometric, olfactory or similar information specifically associated with, or capable of being associated with, any individual or group.

“Surveillance Technology” includes but is not limited to the following: international mobile subscriber identity (IMSI) catchers and other cell site simulators; automatic license plate readers; electric toll readers; closed-circuit television cameras; gunshot detection hardware and services; video and audio monitoring and/or recording technology, such as surveillance cameras, wide-angle cameras, and wearable body cameras; mobile DNA capture technology; biometric software or technology, including facial, voice, iris, and gait-recognition software and databases; software designed to monitor social media services; x-ray vans; software designed to forecast criminal activity or criminality; radio-frequency I.D. (RFID) scanners; and tools, including software and hardware, used to gain unauthorized access to a computer, computer service, or computer network.

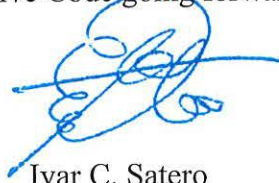
Admin Code §19B.1. Since the Ordinance became effective, COIT has taken responsibility for introducing all department Policies to the Board for approval, including the Airport. Beginning in August 2019, as required under the Ordinance, departments provided COIT with inventories of their existing Surveillance Technology. Soon after, departments began submitting to COIT Surveillance Impact Reports (SIRs), and draft policies generated using COIT's toolbox.

COIT and its Privacy and Surveillance Advisory Board (PSAB) held public hearings to consider the policies and ultimately vote on whether to recommend them to the Board. To date, the Board has approved three Airport Policies for: (1) Airport Security Cameras (Pre-Security Closed-Circuit Television); (2) Third Party Security Cameras, and (3) Automated License Plate Readers. See attached summary of Policies.

Recently, COIT notified City departments that it will no longer be introducing individual department policies, nor their Annual Surveillance Reports to the Board on departments' behalf. Instead, departments will now have that responsibility. COIT will still provide a recommendation letter for the Board file, and present its recommendation on the department's Policy at the Board hearing. In addition, COIT will continue to handle the introduction of citywide Policies to the Board. As a result, Staff recommends that the Commission authorize the Airport to seek Board approval of the Policies going forward.

**Recommendation**

I recommend the Commission authorize the Airport to seek Board of Supervisors' approval of Airport Surveillance Technology Policies and its Annual Surveillance Report pursuant to Chapter 19B of the San Francisco Administrative Code going forward.



Ivar C. Satero  
Airport Director

Prepared by: Ray Ricardo  
Acting Chief Information Officer

Attachment - Surveillance Technology Policies Summary

## Summary of the Airport's Surveillance Technology (ST) Policies

Surveillance Technology (ST)	ST Description	ST Authorized Use Cases – The Airport shall use the ST only for the following authorized purposes:	Benefits of the ST
<b>BOS Approved Policies (STPs):</b>			
Pre-Security Closed-Circuit Television (CCTV) Cameras	<p>Airport owns and operates CCTV cameras which monitor pre-security checkpoint areas that are open and accessible to all members of the public.</p> <p><b>STATUS: POLICY APPROVED</b> 7/27/21 – Board passed 8/4/21 – Mayor approved</p>	<ol style="list-style-type: none"> <li>1. Live Monitoring</li> <li>2. Recording of video and images in the event of an incident.</li> <li>3. Reviewing camera footage.</li> <li>4. Providing video footage/ images to law enforcement or other authorized persons following an incident or upon request, when footage is subject to disclosure pursuant to a Public Records Act Request.</li> </ol>	<p><b>For Residents:</b></p> <ul style="list-style-type: none"> <li>- <u>Health</u>: Protect Safety of Staff, patrons, and facilities while promoting an open and welcoming environment.</li> <li>- <u>Criminal Justice</u>: Review video footage after a security incident; provide video evidence to law enforcement or the public upon request by formal process, order, or subpoena.</li> </ul> <p><b>Civil Rights Impacts and Safeguards:</b></p> <ul style="list-style-type: none"> <li>- The Airport's use of CCTV is restricted to those identified Authorized Use Cases.</li> <li>- The Airport retains CCTV footage for one year, consistent with State law.</li> <li>- Video files are only released through subpoena, a public records act request, to assist law enforcement with an investigation and to assist Airport personnel in the investigation of claims.</li> </ul> <p><b>Fiscal Analysis of Costs and Benefits:</b></p> <ul style="list-style-type: none"> <li>- <u>Financial Savings</u>: Airport CCTV saves on salary cost for Airport staff and SFPD-AB patrol officers.</li> </ul>

## Summary of the Airport's Surveillance Technology (ST) Policies

Surveillance Technology (ST)	ST Description	ST Authorized Use Cases – The Airport shall use the ST only for the following authorized purposes:	Benefits of the ST
			<ul style="list-style-type: none"> <li>- <u>Time Savings</u>: Airport CCTV provides real-time feeds that run 24/7, thus eliminating lengthy physical surveillance of Airport facilities.</li> <li>- <u>Staff Security</u>: Security cameras provide advance view of an incident to better prepare those responding to an incident.</li> <li>- <u>Data Quality</u>: Security cameras operate 24/365 which maximizes the Airport's ability to capture video of incidents. Video can be used to verify the accuracy of written reports regarding the incident.</li> </ul>
<p><u>License Plate Recognition System</u>: Automated License Plate Readers (ALPR) – Ground Transportation Management System (GTMS)</p>	<p>Airport uses license plate recognition cameras on Airport roadways to monitor commercial ground transportation operators and for revenue collection.</p> <p><b>STATUS: POLICY APPROVED</b> 7/27/21 – Board passed 8/4/21 – Mayor approved</p>	<ol style="list-style-type: none"> <li>1. To track the activity of permitted commercial ground transportation at the Airport. Also used as a secondary method for collecting trip fees in the event of an operator's transponder fails to read.</li> <li>2. To support the Airport and local, state, federal, and regional public safety departments in the identification of vehicles that are the subject of investigation; and/or locating victims, witnesses, suspects, and other associated with a law enforcement investigation.</li> </ol>	<p><b>For Residents:</b></p> <ul style="list-style-type: none"> <li>- <u>Environment</u>: Traffic congestion studies – ALPR-GTMS can be used to conduct studies on traffic volumes and patterns, with the potential to mitigate environmental impacts of traffic congestion on residents.</li> <li>- <u>Criminal Justice</u>: ALPR-GTMS can be used to support identification of vehicles as a part of law enforcement investigations.</li> <li>- <u>Public Safety</u>: ALPR-GTMS can be used to locate stolen, wanted, and or other vehicles that are subjects of investigation, and can improve overall roadway safety for residents using Airport roadways.</li> </ul>

## Summary of the Airport's Surveillance Technology (ST) Policies

Surveillance Technology (ST)	ST Description	ST Authorized Use Cases – The Airport shall use the ST only for the following authorized purposes:	Benefits of the ST
			<p><b>Civil Rights Impacts and Safeguards:</b></p> <ul style="list-style-type: none"> <li>- Commercial ground transportation operators acknowledge notice of GTMS Policies and Procedures, which include the Airport's use of ALPR and Electronic Toll Readers, by signing the Airport Permit.</li> <li>- In compliance with California Civil Code 1798.90.5, the Airport shall notify the public of ALPR-GTMS surveillance technology operation by posting the ALPR-GTMS Privacy and Usage Policy on the FlySFO.com website.</li> </ul> <p><b>Fiscal Analysis of Costs and Benefits:</b></p> <ul style="list-style-type: none"> <li>- <u>Time Savings:</u> Without the ALPR-GTMS technology, the Airport would need to deploy a manually staffed ground transportation operation. Team members would have to conduct manual verification of registration via visual observation of permits and decals, and conduct traffic counts. The ALPR-GTMS technology removes the necessity of staffing for these purposes.</li> <li>- <u>Data Quality:</u> The ALPR-GTMS technology is verified against the AVI technology to confirm all permitted vehicles' trips have been documented for tracking and fee assessment purposes</li> </ul>

## Summary of the Airport's Surveillance Technology (ST) Policies

Surveillance Technology (ST)	ST Description	ST Authorized Use Cases – The Airport shall use the ST only for the following authorized purposes:	Benefits of the ST
			<p>(in case the AVI malfunctions and fails to read the Airport transfixed transponder).</p> <ul style="list-style-type: none"> <li>- <u>Financial</u>: The ALPR-GTMS technology enables the Airport to assess trip fees on permitted Commercial ground transportation operators. For example, in 2019, the Airport collected \$64.8M+ in trip fees from ground transportation operators.</li> </ul>
<p><u>Tenant ("Third-Party") Security Cameras</u></p>	<p>Airport Tenants own and operate security cameras in their physical locations within the Airport.</p> <p><b>STATUS: POLICY APPROVED</b> 11/15/22 – Board passed 11/17/22 – Mayor approved</p>	<ol style="list-style-type: none"> <li>1. Reviewing camera footage in the event of an incident.</li> <li>2. Approving Tenant's disclosure of digital recordings and other data from its security camera system.</li> </ol>	<p><b>For Residents:</b></p> <ul style="list-style-type: none"> <li>- <u>Health</u>: Protect Safety of staff, patrons, and facilities while promoting an open and welcoming environment.</li> <li>- <u>Criminal Justice</u>: Review video footage after a security incident; provide video evidence to law enforcement or the public upon request by formal process, order or subpoena.</li> <li>- <u>Financial Savings</u>: Equipment is owned and operated by a non-city entity.</li> <li>- <u>Staff Safety</u>: Tenant/Contractor Security cameras help identify violations of Building Rules and Regulations, and City, State and Federal law and provide assurance that staff safety is emphasized and will be protected at their place of employment.</li> </ul>

## Summary of the Airport's Surveillance Technology (ST) Policies

Surveillance Technology (ST)	ST Description	ST Authorized Use Cases – The Airport shall use the ST only for the following authorized purposes:	Benefits of the ST
			<p><b>Civil Rights Impacts and Safeguards:</b></p> <ul style="list-style-type: none"> <li>- Airport's use of recordings and data from third-party security cameras is restricted to the identified Authorized Use Cases.</li> <li>- Tenant's disclosure of recordings and data from its own cameras is subject to the Airport Rules &amp; Regulations and policies that restrict use of CCTV to the approved use in the Tenant Application.</li> <li>- Tenants are required to report to the Airport any changes or modifications to video monitoring and/or recording device use prior to executing the changes or modifications.</li> <li>- Tenants are required to obtain Airport's written authorization prior to the release of any video monitoring and/or recording device footage from Tenants cameras/devices. In appropriate cases, Airport may also request review and a determination of whether the footage may be disclosed from the Transportation Security Administration (TSA).</li> </ul> <p><b>Fiscal Analysis of Costs and Benefits:</b></p> <ul style="list-style-type: none"> <li>- <u>Financial Savings:</u> Tenants' Security Camera Systems will save on building or patrol officers.</li> </ul>

## Summary of the Airport's Surveillance Technology (ST) Policies

Surveillance Technology (ST)	ST Description	ST Authorized Use Cases – The Airport shall use the ST only for the following authorized purposes:	Benefits of the ST
			<ul style="list-style-type: none"> <li>- <u>Time Savings</u>: Tenants' Security Camera Systems will run 24/365, thus decreasing or eliminating building or patrol officer supervision.</li> <li>- <u>Staff Safety</u>: Tenant/Contractor Security cameras help identify violations of the Patron Code of Conduct and provide assurance that staff safety is emphasized and will be protected at their place of employment.</li> <li>- <u>Data Quality</u>: Security cameras run 24/365, so full-time staffing is not required to subsequently review footage of security incidents. Data resolution can be set by level and is recommended to be set to high resolution.</li> </ul>



## Summary of the Airport's Surveillance Technology (ST) Policies

Surveillance Technology (ST)	ST Description	ST Authorized Use Cases – The Airport shall use the ST only for the following authorized purposes:	Benefits of the ST
<b>COIT Approved Policies (STPs) - Next Step: Seek BOS Approval</b>			
Application Based Commercial Transport (ABCT)	<p>The primary functions for the Application Based Commercial Transport (ABCT) technology are to use location data to help Airport personnel enforce operating agreements for Transportation Network Companies (TNCs), administer and regulate these programs, and for general transportation planning.</p> <ul style="list-style-type: none"> <li>• ABCT reconciles the monthly self-reported invoices from the TNC's (Transportation Network Companies) against its collected data to ensure the Airport is properly compensated for the correct amount of traffic and receives accurate payments each month.</li> </ul>	<ol style="list-style-type: none"> <li>1. To invoice Transportation Network Companies (TNCs) for trip fees based on their passenger pick-ups and drop-offs at the Airport and perform invoice reconciliation.</li> <li>2. To monitor and enforce TNCs' compliance with the conditions of their operating permit and the Airport's Rules &amp; Regulations (R&amp;Rs).</li> <li>3. To provide support for the issuance of citations for traffic violations by the SFPD Airport Bureau.</li> <li>4. To support Public Safety by ensuring only authorized and approved drivers and vehicles are allowed to service passengers at SFO.</li> </ol>	<p><b>For Residents:</b></p> <p><u>Community Development:</u> Equitable distribution of and access to transportation.</p> <p><u>Environment:</u> Traffic patterns and congestion within SFO.</p> <p><u>Jobs:</u> TNC companies and driver's; Ground Transportation Unit (GTU) resources.</p> <p><u>Public Safety:</u> Reduces the risk of fraud and unethical business practices.</p> <p><b>Civil Rights Impacts and Safeguards:</b> SFO strictly prohibits the use of location data to identify or track individual users or customers of the City's Airport transportation system.</p>

## Summary of the Airport's Surveillance Technology (ST) Policies

Surveillance Technology (ST)	ST Description	ST Authorized Use Cases – The Airport shall use the ST only for the following authorized purposes:	Benefits of the ST
			<p>To avoid resident loss of trust, public notice regarding SFO's receipt and use of data regarding TNC drivers' activity at the Airport is provided on the SFOConnect web-site (sfoconnect.com).</p> <ul style="list-style-type: none"> <li>- To avoid discrimination and other potential civil rights impacts, data access is granted only to authorized users for authorized uses.</li> <li>- To protect the individual identities, travel preferences, and trip patterns and behaviors of individuals, any data released to the public through Sunshine requests or Public Records do not contain personal identifying information.</li> <li>- Collected data is stored on a secure network in a restricted, password-protected system that can only be accessed by authorized personnel for authorized uses.</li> </ul> <p><b>Fiscal Analysis of Costs and Benefits:</b>  <u>Financial Savings:</u> Not having to hire additional staff to manually monitor and manage the TNC's activities.</p>

## Summary of the Airport's Surveillance Technology (ST) Policies

Surveillance Technology (ST)	ST Description	ST Authorized Use Cases – The Airport shall use the ST only for the following authorized purposes:	Benefits of the ST
			<p><u>Time Savings:</u> Staff can reconcile monthly invoices quickly with the use of aggregated data, saving dozens of hours per month of accounting time.</p> <p><u>Data Quality:</u> Human error is reduced; information is legible and can be easily sorted and summarized by computers; can be paired with analytical analysis; likely reduction in fraudulent handwritten records; increase in the number of records, since they are automatically created and sent.</p> <p><u>Enforcement of Non-Compliant Drivers:</u> Improved enforcement for non-compliance: drivers exceeding curbside staging times, drop-off and pick-ups at non-designated areas can be subject to fines and/or citations by the Airport (GTU and SFPD-AB), based upon the contracts with the TNC's.</p>
Electronic Toll Readers (ETR)	Use of FasTrak Toll Readers provides the ability to accept an alternate payment method that efficiently processes parking fees.	<ol style="list-style-type: none"> <li>1. Process Parking Transactions.</li> <li>2. Investigation of Parking Transaction Disputes.</li> </ol>	<p><b>For Residents:</b></p> <p><u>Public Safety:</u> More efficient payment systems for customers reduce traffic congestion and bottlenecks,</p>

## Summary of the Airport's Surveillance Technology (ST) Policies

Surveillance Technology (ST)	ST Description	ST Authorized Use Cases – The Airport shall use the ST only for the following authorized purposes:	Benefits of the ST
	<p>Parking efficiency minimizes traffic on SFO's roadways. More efficient payment systems for customers reduce traffic congestion and bottlenecks, decreasing the likelihood of collisions and improving customer safety.</p> <p>Provides a uniform methodology for SFO parking fee collection and more effectively quantifies parking demand, which supports future SFO planning.</p>		<p>decreasing the likelihood of collisions and improving customer safety.</p> <p><u>Convenience:</u> Limits parking congestion through more efficient payment processes.</p> <p><b>Civil Rights Impacts and Safeguards:</b> The Airport strives to mitigate all potential civil rights impacts through responsible technology and data use policies and procedures, and intends to use electronic toll readers and their associated data exclusively for the aforementioned authorized use cases. All other uses, including surveillance of San Francisco residents or groups, are expressly prohibited.</p> <p>Access to personal information collected by the FasTrak Toll Readers is limited only to certain operations and technical employees for limited, approved purposes based on their specific work responsibilities.</p>

## Summary of the Airport's Surveillance Technology (ST) Policies

Surveillance Technology (ST)	ST Description	ST Authorized Use Cases – The Airport shall use the ST only for the following authorized purposes:	Benefits of the ST
			<p>Authorized personnel must submit a request to the Data Steward to access the limited dataset identified. Requesting personnel must specify the reason for their request.</p> <p>Privacy and security training is required for employees with access to Personally Identifiable Information (PII), upon hire or assignment to projects involving toll readers.</p> <p>A breach of the toll reader system is also not likely to compromise personal information, as all data collected by the toll readers is seamlessly transmitted to an Airport database. No data is retained on the toll reader itself.</p> <p>To further avoid breach and misuse of personal information collected by toll readers, storage of PII on databases is encrypted and protected by software, hardware and physical security measures to prevent unauthorized access.</p>

## Summary of the Airport's Surveillance Technology (ST) Policies

Surveillance Technology (ST)	ST Description	ST Authorized Use Cases – The Airport shall use the ST only for the following authorized purposes:	Benefits of the ST
			<p>Third parties with whom the Airport shares PII are also required to implement adequate security measures to maintain the confidentiality of such information.</p> <p><b>Fiscal Analysis of Costs and Benefits:</b></p> <p><u>Financial Savings:</u> Low maintenance and operating costs in addition to minimal training of personnel on the use of the technology.</p> <p><u>Time Savings:</u> Parking fee collections are much more efficient.</p> <p><u>Staff Safety:</u> Staff no longer need to sit in parking booths that are near fast moving vehicles.</p> <p><u>Data Quality:</u> Provides a uniform methodology for SFO parking fee collection, and more effectively quantifies parking demand, which supports future SFO planning.</p>
Gunshot Detection Solution (GDS)	The primary function for the Gunshot Detection Solution (GDS) is a detection and response system designed to protect lives in incidents involving an indoor active	1. Detect the sound of gun shots, aggressive voices, glass breaking, and unusual disturbances (based upon	<p><b>For Residents:</b></p> <p><u>Health:</u> Protect safety of staff, patrons, and facilities while promoting an open and welcoming environment.</p>

## Summary of the Airport's Surveillance Technology (ST) Policies

Surveillance Technology (ST)	ST Description	ST Authorized Use Cases – The Airport shall use the ST only for the following authorized purposes:	Benefits of the ST
	<p>shooter, aggressive behavior, glass breaking or unusual disturbances.</p> <ul style="list-style-type: none"> <li>• By automating the emergency notification process and removing the human element, first responders arrive on scene faster, equipped with the vital information needed to contain threats and mitigate casualties. The GDS provides immediate and accurate response information, including specific location and type of sound, for Airport Commission staff and law enforcement teams.</li> <li>• The gunshot detection system will use existing Wi-Fi access points owned and deployed by the Airport.</li> <li>• All analysis is conducted at the sensor (detector), with no real-time audio transmitted or recorded, ensuring privacy.</li> </ul>	<p>machine learned decibel level) and use of device sensors to locate the origin of the sounds.</p> <ol style="list-style-type: none"> <li>2. Provide the date and time stamp, the type of gun used or sound detected and the geographical location (i.e., which sensor detected the sound) to law enforcement or other authorized persons in connection with the investigation of an incident, or to members of the public when the information is subject to disclosure pursuant to a Public Records Act request.</li> <li>3. Upon a GDS alarm, 9-1-1 Dispatch and the Security Operations Center (SOC) can immediately view CCTV feeds of the location identified in the alarm to provide Airport First Responders situational awareness (i.e., location) of an incident.</li> </ol>	<p><u>Criminal Justice:</u> SFPD-AB can be quickly alerted and respond, when needed, to the sound of gunshots, aggressive voices, glass shattering, or other high decibel level sound disturbances such as blasts, with improved geographic precision. In conjunction with the video images from the Airport's CCTV system, Law Enforcement can be provided situational awareness or information to assist in its investigation of an incident.</p> <p><u>Public Safety:</u> Improved protection of the public and City assets by leveraging remote condition assessment technology, which improves overall situational awareness. The technology helps ensure the safety of the 49,000+ people who work at the Airport and the 58 million people who fly to and from SFO every year.</p>

## Summary of the Airport's Surveillance Technology (ST) Policies

Surveillance Technology (ST)	ST Description	ST Authorized Use Cases – The Airport shall use the ST only for the following authorized purposes:	Benefits of the ST
			<p><b>Civil Rights Impacts and Safeguards:</b></p> <p>The Airport's use of the AmberBox solution is restricted to those identified Authorized Use Cases.</p> <p>Data is housed in servers located in secured areas that are only accessible by approved and badged employees. Cloud access to data is administered by Airport badged employees with access to cloud services that enable continuous monitoring of the Airport account activity.</p> <p><b>Fiscal Analysis of Costs and Benefits:</b></p> <p><u>Financial Savings:</u> The gunshot detection solution (GDS), in conjunction with the Airport Security Camera Systems, will run 24/7, thus decreasing or eliminating the need for additional building or SFPD-AB patrol officer supervision and saving on salary expense.</p>



## Summary of the Airport's Surveillance Technology (ST) Policies

Surveillance Technology (ST)	ST Description	ST Authorized Use Cases – The Airport shall use the ST only for the following authorized purposes:	Benefits of the ST
			<p><u>Time Savings:</u> The gunshot detection solution's automated notification removes the human element of notification which allows first responders to arrive more promptly to the scene to de-escalate any potentially violent situations. Use of the solution provides instant alerts, so that real-time 24/7 CCTV feeds can be viewed, to provide pinpoint location accuracy, thus eliminating lengthy physical surveillance of Airport facilities.</p> <p><u>Staff Safety:</u> The gunshot detection solution will provide immediate information about the location of potential threats to staff safety. The gunshot detection solution will alert Law Enforcement to the location of the incident. This will prompt them to view the camera feeds for an immediate view as the event is occurring, to better prepare those responding to the incident.</p>

## Summary of the Airport's Surveillance Technology (ST) Policies

Surveillance Technology (ST)	ST Description	ST Authorized Use Cases – The Airport shall use the ST only for the following authorized purposes:	Benefits of the ST
			<p><u>Data Quality</u>: The identification of ambient noise from GDS coupled with CCTV cameras use, provides Law Enforcement complete situational awareness.</p>

AIRPORT COMMISSION

CITY AND COUNTY OF SAN FRANCISCO

RESOLUTION NO. \_\_\_\_\_

**RESOLUTION AUTHORIZING THE AIRPORT TO SEEK BOARD OF SUPERVISORS' APPROVAL OF AIRPORT SURVEILLANCE TECHNOLOGY POLICIES AND ANNUAL SURVEILLANCE REPORT PURSUANT TO CHAPTER 19B OF THE SAN FRANCISCO ADMINISTRATIVE CODE GOING FORWARD**

WHEREAS, based on the City's Surveillance Technology Ordinance, San Francisco Administrative Code Chapter 19B (Ordinance or Chapter 19B), adopted by the Board of Supervisors (Board) in 2019, the Airport must obtain Board approval for its Surveillance Technology Policies and Annual Surveillance Report (Policies); and

WHEREAS, Chapter 19B, which has been in effect since July 2019, regulates City departments' acquisition and use of Surveillance Technology, as defined in the Ordinance, and requires that departments adopt Board-approved Policies for each item of Surveillance Technology they currently use or plan to acquire; and

WHEREAS, until recently, the City's Committee on Information Technology (COIT) took the responsibility of obtaining that approval for all City departments, including the Airport, but recently revised procedures now require departments, rather than COIT, to seek such approval from the Board; and

WHEREAS, as a result, Staff requests authorization for the Airport to seek Board approval for these Policies going forward; now, therefore, be it

RESOLVED, that this Commission authorizes the Airport to seek approval for the Airport Surveillance Technology Policies and its Annual Surveillance Report from the Board of Supervisors pursuant to Chapter 19B of the San Francisco Administrative Code going forward.

*I hereby certify that the foregoing resolution was adopted by the Airport Commission  
at its meeting of \_\_\_\_\_*

\_\_\_\_\_  
*Secretary*

December 2, 2024

Ms. Angela Calvillo  
Clerk of the Board  
Board of Supervisors  
City Hall  
1 Dr. Carlton B. Goodlett Place, Room 244  
San Francisco, CA 94102-4689

Subject: Chapter 19B - Acquisition of Surveillance Technology Ordinance: Amended Surveillance Technology Policy being submitted pursuant to Administrative Code Section 19B.2(a).

Dear Ms. Calvillo:

Pursuant to Administrative Code Chapter 19B, Acquisition of Surveillance Technology Ordinance, I am forwarding to the Board of Supervisors the following COIT-approved Amended Surveillance Technology Policy, as that term is defined in Administrative Code Section 19B.1, for the San Francisco International Airport (Airport) for approval.

According to Administrative Code Section 19B.2(a), "a Department must obtain Board of Supervisors approval by ordinance of a Surveillance Technology Policy under which the Department will acquire and use Surveillance Technology..."

The following is a list of accompanying documents:

- This Letter;
- COIT Recommendation Memorandum;
- Ordinance Approving the Amended Airport Surveillance Technology Policy governing the use of Automated License Plate Readers - Ground Transportation Management System and Parking Assist – Parking Guidance System technology.
- Legislative Digest
- Airport Commission Resolution No. 23-0103;
- Memorandum accompanying Airport Commission Resolution No. 23-0103; and
- COIT-Approved Amended Surveillance Technology Policy for Automated License Plate Readers - Ground Transportation Management System and Parking Assist – Parking Guidance System

The following persons may be contacted regarding this matter:

Iyad Hindiyeh, Airport Chief Digital Transformation Officer  
(650) 821-3350, [iyad.hindiyeh@flysfo.com](mailto:iyad.hindiyeh@flysfo.com)

Guy Clarke, IT Governance, Risk & Compliance, Airport ITT  
(650) 821-3392, [guy.clarke@flysfo.com](mailto:guy.clarke@flysfo.com)

Very Truly Yours,

  
Ivar C. Satero  
Airport Director

**AIRPORT COMMISSION** CITY AND COUNTY OF SAN FRANCISCO

**LONDON N. BREED**  
MAYOR

**MALCOLM YEUNG**  
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AIRPORT DIRECTOR

POST OFFICE BOX 8097 SAN FRANCISCO, CA 94128 TEL 650.821.5000 FAX 650.821.5005 [FLYSFO.COM](http://FLYSFO.COM)



# Surveillance Technology Policy

Automated License Plate Readers (ALPR) – Ground Transportation Management System (GTMS)  
Airport [and Park Assist – Parking Guidance System](#)

The City and County of San Francisco values privacy and protection of San Francisco residents' civil rights and civil liberties. As required by San Francisco Administrative Code, Section 19B [and California Civil Code Section 1798.90.51](#), this Surveillance Technology Policy aims to ensure the responsible use of [the](#) Automated License Plate Readers ("ALPR") – Ground Transportation Management System ("GTMS") [and the Park Assist – Parking Guidance System \("Park Assist"\)](#) as well as any associated data, and the protection of City and County of San Francisco residents' civil rights and liberties.

## PURPOSE AND SCOPE

The Department's ("SFO" or "Airport") mission is to provide an exceptional airport in service to our communities.

The Surveillance Technology Policy ("Policy") defines the manner in which the ALPR – GTMS [and Park Assist](#) will be used to support this mission, by describing the intended purpose, authorized and restricted uses, and requirements.

This Policy applies to all department personnel that use, plan to use, or plan to secure ALPR – GTMS [and Park Assist](#), including employees, contractors, and volunteers. Employees, consultants, volunteers, and vendors while working on behalf of the City with the Department are required to comply with this Policy.

## POLICY STATEMENT

The authorized use of ALPR – GTMS [and Park Assist](#) technology for the Department is limited to the following use cases and is subject to the requirements listed in this Policy.

*Authorized Use(s):*

### [ALPR – GTMS and Park Assist:](#)

- 1) To track the activity of permitted commercial ground transportation at the Airport. Also, [to](#) use as a method for collecting trip fees or assessing citations.
- 2) To support the Airport and local, state, federal, and regional public safety departments in the identification of vehicles associated with targets of investigations, including locating stolen, wanted, and or other vehicles that are the subject of investigation; and/or locating victims, witnesses, suspects, and others associated with a law enforcement investigation.
- 3) [To help guide customers to available parking spaces.](#)
- 4) [To help customers locate their vehicles if they forget where they parked.](#)

Prohibited use cases include any uses not stated in the Authorized Use Case section.

Further, processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying

an individual person, data concerning health or data concerning an individual person's sex life or sexual orientation shall be prohibited.

## BUSINESS JUSTIFICATION

ALPR – GTMS [and Park Assist](#) -supports the Department's mission and provides important operational value in the following ways:

The Airport has historically used electronic toll readers and other technologies to monitor commercial ground transportation activity at the Airport. The PIPS Technology™ ("PIPS") ALPR – GTMS solution serves as a secondary source of ensuring commercial ground transportation database information is correct. This is an essential component of a comprehensive and efficient transportation system. Ground transportation activity at the Airport continues to grow in line with air passenger activity. In FY2019, there were over 6,500 (non TNC) vehicles permitted to operate at the Airport, with almost 3,000,000 pickups and drop-offs completed.

[The Airport is committed to efficiently delivering world class customer service while maximizing revenue opportunities. Use of a parking guidance system, Park Assist, significantly reduces time spent searching for parking which leads to more revenue generating opportunities in the terminals. Additionally, by streamlining the process and reducing drive time and emissions, parking efficiency minimizes traffic on SFO's roadways for a premium parking experience.](#)

The primary use for Landside ALPR – GTMS is to capture the activity of permitted commercial ground transportation at the Airport. The ALPR – GTMS acts as a failsafe if the Automated Vehicle Identification (AVI) readers malfunction and fail to read the transponder the Airport affixes to certain types of permitted vehicles. It assists in dispute resolution in the event that the operator challenges the transponder data (i.e., number of trips the operator has made to the Airport) collected from the AVI. [For other types of permitted vehicles, the ALPR and Park Assist GTMS may be used as the primary method for assessing citations.](#)

Additional uses include tracking permitted operators that are not issued transponders, such as TNC vehicles and long-distance bus carriers; tracking unpermitted operators who solicit passengers for rides; and assisting public safety agencies in investigations.

[The Park Assist Parking Guidance System is a camera-based smart sensor automated parking guidance system \(APGS\) that can read license plates and identify when spaces are open or being used. The system utilizes LED lights to signify when parking spaces are available or taken, enhancing convenience, reducing congestion, and optimizing space utilization. Additionally, if a customer forgets where they parked, they can enter their license plate into a kiosk and the system will tell them where that license plate is located within the facility.](#)

In addition, ALPR-GTMS [and Park Assist](#) -promises to benefit residents in the following ways:

- Education
- Community Development
- Health

- Environment

Traffic congestion studies: ALPR – GTMS can be used to conduct studies on traffic volumes and patterns, with the potential to mitigate environmental impacts of traffic congestion on residents. [By reducing the driving time to locate parking spaces, Park Assist can help reduce car emissions.](#)

Criminal Justice

ALPR – GTMS [and Park Assist](#) can be used to support identification of vehicles as a part of law enforcement investigations.

Jobs

Housing

Other

Public Safety: ALPR – GTMS [and Park Assist](#) can be used to locate stolen, wanted, and or other vehicles that are the subject of investigation, and can improve overall roadway safety for residents using Airport roadways.  
Trip fees by permitted operators: ALPR – GTMS can be used to track vehicles and collect trip fees to offset impacts of commercial vehicles on Airport roadways and to improve roadway conditions for residents accessing the Airport.

ALPR – GTMS [and Park Assist](#) will benefit the department in the following ways:

Benefit	Description	Quantity
<input checked="" type="checkbox"/> Financial Savings	<a href="#">Park Assist provides for low maintenance and operating costs, in addition to, minimal training of personnel on the use of the technology. Less personnel are needed to monitor and assist customers finding open spaces and/or their vehicles.</a>	
<input checked="" type="checkbox"/> Time Savings	Without the ALPR – GTMS technology, the Airport would need to deploy a manually staffed ground transportation operation. This alternative has not been thoroughly explored for feasibility. At minimum however, team members would be required to be assigned to all entry lanes, exit lanes, curbside zones, and staging lots during 24/7 operations. Team members would conduct manual verification of registration through visual observance of permits and decals, and conduct traffic counts. The ALPR – GTMS removes the necessity of staffing for this purpose.	
<input checked="" type="checkbox"/> Staff Safety	<a href="#">With Park Assist less staff are needed in facilities to constantly monitor and assist in finding spaces and vehicles; thus, reducing exposure to fast moving vehicles.</a>	
<input checked="" type="checkbox"/> Data Quality	The ALPR – GTMS technology is verified against the AVI technology to verify that all permitted vehicles’ trips have been documented for tracking and fee assessment purposes, in case the AVI malfunctions and fails to read the airport affixed transponder. The ALPR – GTMS is also used in concert with AVI to confirm whether a commercial vehicle on Airport roadways is a permitted operator.	
<input checked="" type="checkbox"/> Other	The ALPR – GTMS technology enables the Airport to assess trip fees on permitted Commercial ground transportation operators. In 2019, <a href="#">for</a>	\$64,815,649 for one year

[example](#), the Airport collected a total of \$64,815,649 in trip fees from ground transportation operators.

**POLICY REQUIREMENTS**

This Policy defines the responsible data management processes and legally enforceable safeguards required by the Department to ensure transparency, oversight, and accountability measures. Department use of surveillance technology and information collected, retained, processed or shared by surveillance technology must be consistent with this Policy; must comply with all City, State, and Federal laws and regulations; and must protect all state and federal Constitutional guarantees.

Specifications:

The software and/or firmware used to operate the surveillance technology must be kept up to date and maintained.

Safety:

Surveillance technology must be operated in a safe manner. Surveillance technology should not be operated in a way that infringes on resident civil rights, including privacy, or causes personal injury or property damage.

Accuracy of ALPR Data:

In the event Landside, Ground Transportation Unit (GTU), or Parking Management become aware of an ALPR data error, the Airport's Information Technology and Telecommunications (ITT) team will correct all associated files.

Data Collection:

Departments shall minimize the use, collection, and retention of Personally Identifiable Information (PII) to what is strictly necessary to accomplish the intended purpose of the surveillance technology.

Department shall only collect data required to execute the authorized use case. All data collected by the surveillance technology, including PII, shall be classified according to the City's [Data Classification Standard](#).

Should information be incidentally collected that is not necessary to accomplish the intended purpose of the surveillance technology, including information that may be used to identify persons or private information, Department shall remove all incidental PII from raw data.

The surveillance technology collects the following data types:

<i>Data Type(s)</i>	<i>Format(s)</i>	<i>Classification</i>
Company's registered DBA	.xml, .pdf, .html, .jpg,	Level 2
Permit Type	.xml	
Location of record		



	<table border="1"> <tr> <td colspan="3">Date and Time of record</td> </tr> <tr> <td>Images of License Plates</td> <td>.jpg, .xml</td> <td>Level 3</td> </tr> <tr> <td>Date &amp; Time image taken</td> <td>.jpg, .xml</td> <td>Level 3</td> </tr> </table>	Date and Time of record			Images of License Plates	.jpg, .xml	Level 3	Date & Time image taken	.jpg, .xml	Level 3
Date and Time of record										
Images of License Plates	.jpg, .xml	Level 3								
Date & Time image taken	.jpg, .xml	Level 3								
<p>Notification:</p>	<p>The commercial ground transportation operators acknowledge notice of GTMS policies and procedures, which include the Airport’s use of ALPR and Electronic Toll Readers, by signing the Airport permit. In addition, in compliance with California Civil Code § 1798.90.5, the Airport shall notify the public of the ALPR – GTMS <a href="#">and Park Assist</a> surveillance technology operation by posting the ALPR – GTMS privacy and usage policy on FlySFO.com.</p> <p>The public notice shall include the following items :</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Information on the surveillance technology</li> <li><input type="checkbox"/> Description of the authorized use</li> <li><input type="checkbox"/> Type of data collected</li> <li><input type="checkbox"/> Will persons be individually identified</li> <li><input type="checkbox"/> Data retention</li> <li><input type="checkbox"/> Department identification</li> <li><input type="checkbox"/> Contact information</li> </ul>									
<p>Access:</p>	<p>All parties requesting access must adhere to the following rules and processes:</p> <p>Use of the Ground Transportation Management System (GTMS) software <a href="#">and Park Assist</a> are required for data access. Agreement and adherence to the City and County of San Francisco’s and Airport’s computer and data information systems policies, supervisor approval for use, and GTMS Administrator approval for use. Request for system access is to be submitted through SFO’s ITT Help Desk ServiceNow online Request Form. Access can be limited and varied dependent on software system user role. GTMS Administrator and ITT are to determine and provide permissions on user role. Training to be provided once software is installed on a computer or laptop.</p> <p>Data can only be accessed through the permissions-controlled GTMS software. The data is to be used for trip and revenue analysis for internal purposes. Information deemed low risk such as Permit Type (i.e., Limousine, Taxi) and trip counts may be aggregated and shared with the public, other airports, and transportation industries. The public may request trip and revenue information through a public records request.</p> <p>A. <i>Department employees</i></p>									

Once collected, the following roles and job titles are authorized to access and use data collected, retained, processed or shared by the surveillance technology.

- 1828 Principal Administrative Analyst II
- 1823 Senior Administrative Analyst
- 1822 Senior Administrative Analyst
- 1446 Secretary 2
- 1825 Principal Administrative Analyst II
- 1823 Senior Administrative Analyst
- 1822 Administrative Analyst
- 7315 Automotive Machinist Assistant Supervisor
- 5290 Transportation Planner IV
- 5241 Engineer
- 5203 Assistant Engineer
- 5201 Junior Engineer
- 5380 StdntDsgnTrain1, Arch/Eng/Plng
- 5381 StdntDsgnTrain2, Arch/Eng/Plng
- 5382 StdntDsgnTrain3, Arch/Eng/Plng
- 7381 Automotive Mechanic
- 9255, Parking Operations Manager
- 0931 Manager III, Airport – Landside Operations
- 0923 Manager II, Ground Transportation Investigations Manager
- 0932 Manager IV, Airport Parking Manager
- 0933 Manager V
- 9236, Ground Transportation Technician
- 9144, Ground Transportation Compliance Investigator

The following providers are required to support and maintain the surveillance technology and its associated data to ensure it remains functional:

- Arcadis
- SP Plus SF Joint Venture (SPSF)
- Park Assist

#### *B. Members of the public*

Airport will comply with the California Public Records Act, the San Francisco Sunshine Ordinance, the requirements of the federal and State Constitutions, and federal and State civil procedure laws and rules.

Collected data that is classified as Level 1-Public data may be made available for public access or release via DataSF's [Open Data](#) portal. Anyone, including criminal defendants, may access such data. Open Data has a Public Domain Dedication and License and makes no warranties on the information provided. Once public on Open Data, data can be freely shared, modified, and used for any purpose without any restrictions. Any damages resulting from use of public data are disclaimed, including by criminal defendants.

Members of the public, including criminal defendants, may also request access by submission of a request pursuant to San Francisco's [Sunshine Ordinance](#). No record shall be withheld from disclosure in its entirety unless all information contained in it is exempt from disclosure under express provisions of the California Public Records Act or some other statute.

<p>Data Security:</p>	<p>Department shall secure PII against unauthorized or unlawful processing or disclosure; unwarranted access, manipulation or misuse; and accidental loss, destruction, or damage. Surveillance technology data collected and retained by the Department shall be protected by the safeguards appropriate for its classification level(s).</p> <p>To protect surveillance technology information from unauthorized access and control, including misuse, Departments shall, at minimum, apply the following safeguards:</p> <p>Data can only be accessed through the permissions-controlled GTMS software. Users must provide unique computer login credentials such as username and password to access the data. Passwords must comply with the City and County of San Francisco cyber security requirements.</p> <p>The following protocols shall be followed to ensure data security:</p> <ul style="list-style-type: none"> <li>• All network equipment and servers containing sensitive data are maintained in a secured location accessible only to Airport badged, authorized personnel.</li> <li>• Servers and network equipment are continuously monitored.</li> <li>• ITT maintains a log of successful and unsuccessful logon attempts, changes in user accounts, whether user logs have been modified, network threats, and resource access.</li> <li>• All SFO workstations and servers are patched regularly.</li> <li>• All sensitive data stored on the servers are backed up regularly and a copy saved offsite.</li> <li>• SFO's network is protected behind a firewall and data transmitted outside SFO's network to SFO cloud-based partners are encrypted via SSL/TLS. Data at rest offsite are also encrypted.</li> </ul>
<p>Data Sharing:</p>	<p>Airport will comply with the California Public Records Act, the San Francisco Sunshine Ordinance, the requirements of the federal and State Constitutions, and federal and State civil procedure laws and rules.</p> <p>Airport will endeavor to ensure that other agencies or departments that may receive data collected by ALPR – GTMS <a href="#">and Park Assist</a> Technology will act in conformity with this Surveillance Technology Policy.</p> <p>For internal and externally shared data, shared data shall not be accessed, used, or processed by the recipient in a manner incompatible with the authorized use cases stated in this Policy.</p> <p>Airport shall ensure proper administrative, technical, and physical safeguards are in place before sharing data with other CCSF departments, outside government entities, and third-party providers or vendors. (See Data Security)</p> <p>Airport shall ensure all PII and restricted data is de-identified or adequately protected to ensure the identities of individual subjects are effectively safeguarded.</p> <p>Each department that believes another agency or department receives or may receive data collected from its use of STs should consult with its assigned deputy city attorney regarding their response.</p>

The Department currently participates in the following sharing practices:

A. Internal and External Data Sharing

- GTMS Users for review of matching license plates and electronic toll reads;
- Park Assist Users, including SPSF, to look-up license plates to locate vehicle locations in the Airport's parking facilities;
- District Attorney's Office in accordance with the law;
- Public Defender's Office or criminal defense attorney in accordance with California discovery laws; law enforcement agencies as part of a criminal or administrative investigation; Parties to civil litigation, or other third parties when required under law; and
- -Federal Bureau of Investigations (FBI), Department of Motor Vehicle (DMV) and California Public Utilities Commission (CPUC) to determine whether any vehicles have been stolen, operating without authorization, or are otherwise associated with criminal activity.

Data sharing occurs at the following frequency:

- On request in accordance with the law, or during SFO presentations on topics related to ground transportation activity.

Before sharing data with any recipients, the Department will use the following procedure to ensure appropriate data protections are in place:

- ✓ Confirm the purpose of the data sharing aligns with the department's mission.
- ✓ Consider alternative methods other than sharing data that can accomplish the same purpose.
- ✓ Redact names, scrub faces, and ensure all PII is removed in accordance with the department's data policies.
- ✓ Review of all existing safeguards to ensure shared data does not increase the risk of potential civil rights and liberties impacts on residents.
- ✓ Evaluation of what data can be permissibly shared with members of the public should a request be made in accordance with the San Francisco's Sunshine Ordinance.
- ✓ Ensure shared data will be done in a cost-efficient manner and exported in a clean, machine-readable format.

B. Department shares the following data with the recipients:

- Aggregated trip counts and revenue by permit types. Data constituting PII or other sensitive information will be shared with law enforcement agencies in accordance with the law, and with parties involved in criminal, civil or administrative proceedings as required under law.
-

	<p>To ensure that entities receiving data collected by the surveillance technology comply with the Surveillance Technology Policy, Department shall:</p> <ul style="list-style-type: none"> <li>• Data collected is primarily to be accessed by internal stakeholders within the Airport department. All Airport users are to comply with the Airport’s computer and cybersecurity policies, as agreed upon through daily computer sign-in. Data shared with external entities or other City and County departments is to fall within the Level 2 category of non-sensitive data for the business purposes of improved commercial ground transportation and analyses. Information within the Level 3 low-moderate risk category must be requested through the public records request process, and the data is reviewed prior to disclosure to ensure that it is subject to disclosure under the Public Records Act and the Sunshine Ordinance.</li> <li>• The Department will comply with the California Public Records Act, the San Francisco Sunshine Ordinance, the requirements of the federal and State Constitutions, and federal and State civil procedure laws and rules.</li> </ul>
<p>Data Retention:</p>	<p>The Department’s data retention period and justification are as follows:</p> <ul style="list-style-type: none"> <li>• Data is active for 18 months in the production server, then 4.5 years in cloud storage.</li> <li>• Airport server storage size limits retention on production server</li> <li>• Airport Data Retention Policy requires 4.5 years</li> <li>• <u>Data would only be retained longer than above if/when the City Attorney issued a litigation hold letter to the Airport.</u></li> </ul> <p><a href="#">NOTE: Park Assist does not retain license plate data.</a></p> <p>PII data shall not be kept in a form which permits identification of data subjects for any longer than is necessary for the purposes for which the personal data are processed. PII data collected by the surveillance technology may be retained beyond the standard retention period only in the following circumstance(s):</p> <p>Departments must establish appropriate safeguards for PII data stored for longer periods.</p> <p>Data will be stored in the following location:</p> <ul style="list-style-type: none"> <li>• Local storage</li> <li>• Cloud Storage Provider</li> </ul>
<p>Data Disposal:</p>	<p>Upon completion of the data retention period, Department shall dispose of data in the following manner:</p> <p>Practices: Data is consolidated on the local storage and moved to cloud provider for long term storage. Local drives are overwritten with new data. Cloud storage data is deleted.</p> <p>Processes and Applications: Not applicable for this technology solution</p>

Training:

To reduce the possibility that surveillance technology or its associated data will be misused or used contrary to its authorized use, all individuals requiring access must receive training on data security policies and procedures.

At the very least, department shall require all elected officials, employees, consultants, volunteers, and vendors working with the technology on its behalf to read and formally acknowledge all authorized and prohibited uses. Department shall also require that all individuals requesting data or regularly requiring data access receive appropriate training before being granted access to systems containing PII.

In-person or virtual training session that includes system overview and use of reporting modules.

## COMPLIANCE

Department shall oversee and enforce compliance with this Policy using the following methods:

The Airport's ITT and Government Affairs & Policy teams will both govern and oversee compliance of the policy. Any resulting policy is to be shared with the Airport community with follow-up items, if any, documented.

Department shall assign the following personnel to oversee Policy compliance by the Department and third-parties.

- IT Governance Director, ITT Cybersecurity & Compliance
- [Senior Landside Transportation Planner](#)
- [Parking Operations Manager](#)
- [Airport Parking Manager](#)

Sanctions for violations of this Policy include the following:

- Airport Commission employees will be disciplined for violation of the Ordinance subject to meeting and conferring with the unions representing Airport Commission employees.

If a Department is alleged to have violated the Ordinance under San Francisco Administrative Code Chapter 19B, Department shall post a notice on the Department's website that generally describes any corrective measure taken to address such allegation.

Department is subject to enforcement procedures, as outlined in San Francisco Administrative Code Section 19B.8.

## EXCEPTIONS

Only in exigent circumstances or in circumstances where law enforcement requires surveillance technology data for investigatory or prosecutorial functions may data collected, retained or processed by the surveillance technology be shared with law enforcement.

## DEFINITIONS

Personally Identifiable Information:

Information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.

Sensitive Data:

Data intended for release on a need-to-know basis. Data regulated by privacy laws or regulations or restricted by a regulatory agency or contract, grant or other agreement terms and conditions.

## **AUTHORIZATION**

Section 19B.4 of the City's Administrative Code states, "It is the policy of the Board of Supervisors that it will approve a Surveillance Technology Policy ordinance only if it determines that the benefits the Surveillance Technology ordinance authorizes outweigh its costs, that the Surveillance Technology Policy ordinance will safeguard civil liberties and civil rights, and that the uses and deployments of the Surveillance Technology under the ordinance will not be based upon discriminatory or viewpoint-based factors or have a disparate impact on any community or Protected Class."

## **QUESTIONS & CONCERNS**

*Public:*

Complaints or concerns can be submitted to the Department by completing a Contact SFO Form found on FlySFO.com. The submissions are reviewed by the Airport Guest Services team and forwarded to the Airport stakeholder team responsible for follow-up, as necessary, on the topic of concern or comment. Additionally, the Airport Commission holds bi-monthly public meetings where the public may register complaints or concerns during the Public Comment section of the calendared agenda.

Department shall acknowledge and respond to complaints and concerns in a timely and organized response. To do so, Department shall:

- Include in the daily tasks and job duties of Landside [and Parking](#) staff and its contractors to respond to complaints and concerns submitted by the commercial transportation.
- Consistent with these duties, Landside staff responds to all inquiries from commercial passenger transportation providers.
- In addition, the Airport's Guest Services team dedicates a staff to address complaints and concerns from the public.
- Any matters brought to the Airport are tracked from initial receipt of communication through closure of follow-up actions, if any.

*City and County of San Francisco Employees:*

All questions regarding this policy should be directed to the employee's supervisor or to the director. Similarly, questions about other applicable laws governing the use of the surveillance technology or the issues related to privacy should be directed to the employee's supervisor or the director.



# Committee on Information Technology

Office of the City Administrator

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To: Members of the Board of Supervisors  
From: Carmen Chu, City Administrator  
Katharine Petrucione, Deputy City Administrator, City Administrator  
Date: October 7, 2024

Subject: Legislation introduced to approve Surveillance Technology Policy Amendments for the Airport's Automated License Plate Readers (ALPR) – Ground Transportation Management System (GTMS) Airport and Park Assist – Parking Guidance System.

In compliance with Section 19B of the City and County of San Francisco's Administrative Code, the City Administrator's Office is pleased to submit the Surveillance Technology Policy for the Airport's Automated License Plate Readers (ALPR) – Ground Transportation Management System (GTMS) Airport and Park Assist – Parking Guidance System.

To engage the public in discussion on the role of government surveillance, the Committee on Information Technology (COIT) and its subcommittee the Privacy and Surveillance Advisory Board (PSAB) held 2 public meetings for Automated License Plate Readers (ALPR) – Ground Transportation Management System (GTMS) Airport and Park Assist – Parking Guidance System. between June and September 2024 to review and approve the policy. All details of these discussions are available at [sf.gov/coit](https://sf.gov/coit).

The following page provides greater detail on the review process for the Surveillance Technology Policy, and COIT's recommended course of action.

If you have questions on the review process please direct them to Katharine Petrucione, Deputy City Administrator of the City Administrator's Office.



## ALPR

Department	Authorized Uses
Airport	<ol style="list-style-type: none"><li data-bbox="565 289 1321 394">1. To track the activity of permitted commercial ground transportation at the Airport. Also, to use as a method for collecting trip fees or assessing citations.</li><li data-bbox="565 401 1377 617">2. To support the Airport and local, state, federal, and regional public safety departments in the identification of vehicles associated with targets of investigations, including locating stolen, wanted, and or other vehicles that are the subject of investigation; and/or locating victims, witnesses, suspects, and others associated with a law enforcement investigation.</li><li data-bbox="565 623 1263 653">3. To help guide customers to available parking spaces.</li><li data-bbox="565 659 1344 730">4. To help customers locate their vehicles if they forget where they parked.</li></ol>

### ALPR Public Meeting Dates

Date	Meeting
June 27, 2024	Privacy and Surveillance Advisory Board (PSAB)
September 19, 2024	Committee on Information Technology (COIT)

COIT recommends the following action be taken on the policy:

- Approve the Automated License Plate Readers (ALPR) – Ground Transportation Management System (GTMS) Airport and Park Assist – Parking Guidance System for the Airport