

Submitter: Sean Patrick  
On Behalf Of: PDX Privacy  
Committee: House Committee On Rules  
Measure, Appointment or Topic: SB1516

It is with a heavy heart that I implore you to vote NO on SB 1516A as currently written.

My name is Sean Patrick, and I'm writing representing PDX Privacy, a Portland-area, volunteer led nonprofit organization committed to the concept of privacy as a human right.

As a civil liberties activist, I have been deeply concerned about the proliferation of ALPR systems of all kinds, but especially those run by Flock Safety.

I, like many others, had high hopes for meaningful legislation that would finally regulate this dangerous technology in a way that protects the civil liberties of Oregonians and prevents the development of a surveillance dragnet, one that captures data from law-abiding residents and allows for the development of hazardous "pattern of life" profiles.

Sadly, SB 1516A is NOT this legislation.

In the "11th hour" industry lobbyists stripped out the most meaningful provisions from this bill, rendering it ineffective as a reform measure. In particular, removing the definition for end-to-end encryption prevents the most important method we have for making this technology safer, from being effective.

Without strictly-defined, end-to-end encryption, Flock Safety and other providers will retain access to license plate data. This data can simply be extracted and sold into data broker systems, including those that fuel our current federal administration's violations of due-process, before the newly-legislated 30-day deletion period expires.

This is utterly unacceptable.

What's worse, there appears to be little to prevent the preemption of local laws that might attempt to regulate this technology more strenuously within our municipalities and counties.

We desperately need ALPR reform, but SB 1516A is not it.

The only way to save this bill would be to amend it as follows:

1. The strict definition of "end-to-end encryption" must be returned to the text.
2. Local, more restrictive ALPR regulations proposed by counties and municipalities must NOT be preempted.

We would also strongly prefer to see the use of ALPRs be restricted to major crimes, not minor offenses. In addition, we would also prefer a 21-day (or less) limit on data retention, like Maine and Virginia maintain, as opposed to the 30-days currently proposed.

Thank you for your prompt attention to this matter and for supporting reforms that actually work,

With best regards,

Sean Patrick  
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